



Environmental Assessment Comments

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Ordered by first name

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2019 0320 EJ Finneran

Comment: Stockholm implemented congestion pricing nearly 15 years ago and it solved traffic congestion overnight. Also, childhood asthma dropped nearly 50 percent. Can you commit that this project will drop childhood asthma in Portland by the same amount?

I think building an extra lanes to solve congestion when there are proven solutions that cheaper, faster and better for human health is misguided.

<https://www.sciencedirect.com/science/article/abs/pii/S0967070X11001284>

<https://www.washingtonpost.com/news/tripping/wp/2018/03/27/congestion-pricing-clears-the-lungs-too-researchers-say/>

Attachments: N/A

2019 0331 Eamonn Kearney

Comment: My name is Eamonn Kearney and I wish to let you know that as a lifelong Portland resident, I do not want to see the expansion of I-5 through the Rose Quarter area. Not only will it not help traffic because of increased usership, but I also believe the environmental impact will negatively affect historically black and impoverished neighborhoods in a way we would never allow to happen in historically white and wealthy neighborhoods. For this price tag, I would rather see safety improvements to areas where people are actually hurt or die every week. Areas like 82nd Ave., Foster, Powell, and Sandy. More pedestrian and cyclist safety features would not only save lives and help traffic move more swiftly in our arterial neighborhoods, but it would also bolster our reputation as a city that works for its citizens; as a city committed to its Vision-Zero plan; as a city that deserves its reputation as a green mecca.

Attachments: N/A

2019 0331 Ed

Comment: I haggled oppose this project. It does not sit well with me that ODOT has not been completely transparent and has with held information/drawings from the public. This is a huge feeling of mistrust and I ask that we slow down until a full environmental impact would be. Especially for those who are attending school and living in that neighborhood. This smells bad. I oppose this project.

Attachments: N/A

2019 0312 Ed Kaiel

Comment: Science and facts are clear that this expansion, especially at this point in climate crisis time, is messed up big time. I breathe the filthy air created by this freeway every day and night. Our new grandson and his parents, who also live close to I-5 in our neighborhood, are impacted by the carbon filth spewed day in and day out. My asthma is directly attributable to our proximity to I-5. Rest assured I will be hitting the streets with thousands of Oregonians opposed



to this unsupportable expansion. You(plural) and I both know adding more cars will add to the devastating impacts of our climate crisis.

Attachments: N/A

2019 0331 Eddie Barnhart

Comment: I am writing to express my opposition to current freeway expansion plans. I'm a life long Portlander and while I studied urban planning at PSU, I learned freeway expansion does not solve congestion. The current proposal is against the ethos of the many Portland residents like me who understand the importance of limiting automobile dependence. By making a heavy investment in freeway expansion we are missing an opportunity to move towards a less car focused urban plan. Please understand I am not be obstructionist in voicing my dissent to the current proposal. I say no to freeway expansion, but yes to bus rapid transit, yes to congestion pricing, and yes to investments in pedestrian improvements. Thank you

Attachments: N/A

2019 0326 Edith

Comment: 1) I live in Parkrose, just off Sandy Blvd. I am fortunate enough to live a short walk away from the Parkrose/Sumner transit center. But as I go into Portland on the train, I see that the I 205 multi use path is constantly littered and filled with trash. Gateway Transit Center is understaffed and also dirty.

2) On my side of Parkrose, there are very few sidewalks, and people must share the street with cars, many of which do not obey speed limits for neighborhoods. In addition, some streets are not even paved or maintained at all.- despite prior promises by City of Portland AND State Of Oregon for basic urban amenities.

3) Related to above, ODOT and City of Portland have a history of saying one thing and doing another: We say that we care about our citizens and that we care about our carbon footprint, but construction a freeway that encourages yet more driving is a contradiction of that.

The idea of \$500M being used to widen a freeway instead of maintaining our multi use paths, not paving roads in working class and poor areas, not providing safe ways to walk or bike in those areas, and not providing more buses with trained drivers (whom we can pay an excellent salary & benefits) is a spendthrift, foolish one, a building project that will NOT benefit the State of Oregon or City of Portland, beyond a few high bidders for the jobs.

Attachments: N/A

2019 0312 Edith Gillis

Comment: Hello, my name is Edith Gillis and I'm also opposing the expansion. I want to give you an understanding of some of the consequences of diesel particulate and the fumes, the carbon monoxide poisoning. I deal every day with people who have been brain damaged, their



immune system damaged, and have a lot of emotional and behavioral and social problems because of the poisoning that is going to be happening worse if you expand this. With autism, there is damage to the front of the brain that they are not able to access executive function. There is emotional regulation. The sensory stuff is extreme. The body is, like, danger, danger, danger, danger. And so there's, like, potential PTSD and can be an escalation, escalation very quickly of high stress and then collapse. And then not even being aware of your meltdowns, your violence, whatever. Never belonging, always feeling anxiety, that nothing is quite right and that no one understands and no one supports you. And I also deal with elderly people who have different forms of non-Alzheimer, the dementias that are being caused by diesel. It's a very lonely life that you can't think as you used to think. You can't have a relationship that you used to have. You can't function as you used to and it's a very, very scary world. Please don't have more people experiencing this and more family members feeling lonely that they cannot connect and ashamed -- socially isolated because someone who needs to take care of someone who is not there for them.

Attachments: N/A

2019 0329 Edward Murphy

Comment: As a long time, (25 years) resident and business owner in the Eliot neighborhood of Portland I am fully AGAINST the plan to expand the i5 freeway through NE Portland. The tax money could be used in a much more efficient manner to improve transportation for all. Encouraging more carbon producing vehicle use is the opposite of what we should be doing for our planet in the face of global warming.

Attachments: N/A

2019 0320 Edward Nolan

Comment: In a city like Portland, which is in dire need of improved freeway capacity, I think your plan is great. Not only does it help with pollution, addresses safety, and congestion. It is the least that can be done to address our growing city. We can't ignore the projected growth and we need to address this problem that will only worsen. I see the congestion ranking's every year, and while greater Portland has only 2.2M people, we are ranked to have the 7th worst congestion in the USA, while the greater metro area of Phoenix has 4.2M is ranked to have the 47th worst congestion. What's the difference? 1,405 lane miles of freeway as of 2005 in Phoenix, as well as wider arterials. then Portland. Less congestion, means less tail pipe emissions. Please build it.

Attachments: N/A

2019 0311 Edward Pentin

Comment: Comment: Confirm that you are not a robot, and Here is a good promotion for your team. <https://drive.google.com/file/d/1f6ZDyLqjyYf7drJlvL-9AKBwPUGn8tT6/preview>



Attachments: N/A

2019 0215 Edward Sackinger

Comment: The environmental assessment makes no mention of congestion pricing which I thought was impetus for this project in the first place. It sounds like you don't want congestion pricing to happen. Most of these crashes are low speed crashes which in turn only cause damage to cars. There are other roads in the Portland region that are literally killing people, and yet this is a priority?

This project also increases VMT under your own admission. We need to decrease VMT in order to meet our environmental targets. There is simply no way long term we can meet our environmental targets without decreasing VMT.

We need to be looking at removing the eastbank freeway. It's antiquated and congested. The only way to fix this is to remove it. You're proposing to add more lanes which you in turn admit will just fill up with more cars. Remove the Eastbank Freeway, and decrease VMT.

Attachments: N/A

2019 0326 Eileen

Comment: Hi, I commute from outer SE to downtown for work full time and I think the freeway expansion project is an embarrassing proposition for such a supposedly forward-thinking city. Not only is there significant evidence showing that the expansion would be overall damaging and not actually helpful in reducing congestion. it also demonstrates that the city is more interested in capital gain for a few over the total well-being of a growing community. It is immoral to continue with this project and will become a shameful mark of ODOT's priorities as other countries and US cities continue to push towards more sustainable city planning.

Attachments: N/A

2019 0227 Eileen Chieco

Comment: Freeway expansion is the opposite of what should be considered by any municipality that pretends to care about its citizens and the environment. Freeway expansion has never solved traffic congestion, in any North American city. Five hundred million dollars should be used to expand public transit/bicycle lanes, not contribute to the further use of fossil fuels.

Attachments: N/A

2019 0401 Eileen Chieco

Comment: No freeway expansion! Climate change is real!

Attachments: N/A



2019 0312 Eileen Ryan

Comment: As a tax payer, I implore you to use this money on public transportation. Please do not do this highway project.

Attachments: N/A

2019 0401 Eileen Stark

Comment: As a biologist and Portland resident, I am strongly opposed to expanding freeways. The most pressing and dangerous issue right now is the climate crisis and we ought to be doing everything we can to get people out of their cars and onto bicycles, their feet, and mass transit. Moreover, extra freeway lanes won't do anything to alleviate traffic congestion; there are just too many people. I'd like to see a full EIS and a study examining all the alternatives, including decongestion pricing. This planet cannot take more air pollution and it is reckless to not promote the least destructive means of transportation!

Attachments: N/A

2019 0402 Elena Sokol

Comment: I am a resident of Portland since 2017 and I oppose the Rose Quarter Freeway Expansion project. I want to explain to you my reasons why I do not support this:

1) The enormous cost for very little benefit:

This money should instead be spent on countless projects that improve traffic and transit around the city. There is an enormous need for better pedestrian, bike, transit and car infrastructure in Portland. As a person who commutes to downtown mainly by public transit and by bike, I see the problems first-hand. As a resident of SE Portland, I see the unpassable gravel streets and lack of sidewalks daily. Having bad transit options and bad pedestrian infrastructure contributes to more people driving in Portland than in other west coast cities. Expanding the freeway is only going to create more congestion and increase traffic without solving any of the aforementioned issues.

2) The increased pollution and impacts on climate:

Induced demand should be seriously considered before planning this expansion. Other cities who significantly expanded their highways learned that demand increased and those same highways were clogged by traffic once again. Hence, I believe expanding the I-5 would not have an effect on alleviating congestion and just lead to more pollution long term. Is spending this enormous sum justified if congestion returns almost immediately? I don't think so. Is it morally justified to build something that will lead to more pollution and contribute to climate change?

3) The negative impacts on the existing pedestrian and bike infrastructure:

Expanding the freeway over the East Bank Esplanade has to be the worst possible solution because it will make this important recreational and active commuting route even less usable



than it is now. It will also create more opportunities for camping under the overpass for the city's houseless residents which will undoubtedly lead to health and safety and environmental concerns.

4) Consider the impact congestion pricing on freeway traffic:

It only makes sense to see what a relatively low cost solution like congestion pricing will do to the freeway traffic before jumping into this enormously expensive project. Other cities, like most recently New York, are implementing this with great results.

In my opinion we do NOT need a freeway occupying prime riverside space on the east side of Portland. There is no need for two freeways if the 405 already provides a connection between the east and west sides. I think it would be best for the city and its residents if that section of the I-5 was dismantled and all traffic routed through the I-405. The 405 should be capped to control the noise, pollution and reconnect the neighborhoods around it. We can then develop the east side riverfront into a great modern park with pedestrian and bike infrastructure, a jewel in Portland's central core.

In short, this expansion project is, in my opinion, misguided, based on an incorrect set of assumptions, and does not address what this city really needs. A full assessment of environmental impacts taking into account noise, pollution, induced demand, congestion pricing, effects on pedestrian and bike infrastructure, is needed before this project is approved.

Attachments: N/A

2019 0331 Elice Simmering

Comment: I vehemently disagree with the Moda Center Freeway expansion. There are a variety of ways we could better spend these funds to help connect the communities within our city and the air pollution is already incredibly concerning which will not be helped by additional freeways. Please do not continue with this expansion. I urge you to reconsider.

Attachments: N/A

2019 0226 Eliot Cole

Comment: There is absolutely no reason to expand I-5. We need to be spending on mass transit and promoting alternatives to car traffic, not encouraging people to drive more and removing bike routes. As a bicycle commuter who uses the Flint overpass almost every day, I am outraged that already out-of-control car traffic is being prioritized over the safety and convenience of healthier and greener alternatives like cycling. As a human being, I am outraged that freeway expansions are still being considered, given the dire state of our planetary climate-according to scientists we have 12 years to stop irreversible catastrophic climate change that puts our entire species at risk of extinction. As a young person I am furious that my future existence is being sold out for the convenience of car commuters, many of whom live in areas under-served by transit and have no alternative. On top of all this, freeway expansions have



been shown time and time again not to actually decrease congestion. It is unfathomable that this would be seen as a priority in 2019.

Attachments: N/A

2019 0331 Eliot LUTC Chair

Community Group

Comment: We ask that you eliminate all funding, cease all planning work, and completely abandon the I-5 Rose Quarter Project. We additionally ask that this project be removed from all Portland and Metro Transportation System Plans. This project would be a major step in the wrong direction for our city, the climate, and our neighborhood. Other organizations are asking for a full Environmental Impact Statement from this project, but we know what the real impact of this project will be already. Further study will not substantially change the project's impacts on our city and neighborhood. Delaying the project only to kill it later is a waste of time and taxpayer resources that should be instead planning a better, greener future for our regional transportation system. Portland has a legacy of turning down ill-advised freeway projects. We removed the Harbor Drive Freeway in 1974 and canceled the Mt. Hood Freeway in 1976. Let's add to that "ended I-5 expansion in 2019."

Environmental Justice

The construction of I-5 through the Albina district, including Eliot, is symptomatic of systemic racism in public policy that destroyed Portland's Black neighborhoods. Eliot has struggled for years and now has something to be very proud of, Harriet Tubman Middle School. However, students at Tubman have to breathe toxic exhaust from cars and diesel trucks driving through Portland. If we care about mitigating the effects of pollution for this vulnerable population, we must discuss how to make our car and truck fleet pollute much less. We must also consider the long term goal of reducing the impacts of, and ultimately the removal of I-5 and other freeways. Our neighbors in Vancouver, BC refused to construct urban freeways in the first place and they have thrived without them. No freeway expansion has ever reduced congestion. Adding capacity to I-5 is all but guaranteed to result in increased cars and truck trips, leading to worse air quality, especially for our neighborhood and the students of Tubman.

Climate Change

According to the latest data from the International Panel on Climate Change, we have 11 years to cut carbon emissions by half in order to avoid catastrophic climate change. This necessitates a dramatic shift in how our society does everything, including moving people and goods. If we are going to have any meaningful chance of addressing climate change, we need to make dramatic moves to shift trips away from cars to more sustainable modes like public transit, biking, and walking. An investment in widening our freeways is an investment in another nail in our collective coffin. If we care about human society persisting beyond the 22nd century, we must start getting cars off the roads ASAP.

Lack of Transportation Throughput Benefits



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

During the 2010-12 process, we were told that the highway engineers were struggling with their computer models to show that the project had any benefits at all. Recently, we have found out that the models projecting benefits from the project are due to inclusion of all projects in the Regional Transportation Plan being built. Institutional memory shows that we have never accomplished that in the past and it is an unwise assumption to make going forward. A true “no-build” analysis would show that

this project on its own will not provide substantial benefits.

Safety

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

The removal of Flint bridge appears to place cyclists onto either a very steep road or in mixed traffic with motor vehicles. We are aware the current renderings are not finalized, but it appears bikes are an afterthought and will be squeezed in where it is possible at the last minute, likely leading to unsafe outcomes.

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

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

Fiscal Responsibility



Half a billion dollars is a substantial amount of money. America collectively and the Portland region have invested a ton of money in project after project to increase the freeway network. Locally, Portland has avoided most of these projects due to smart-minded citizens and politicians knowing that moving more traffic through an area (even if slightly faster) does not help build a stronger place. The I-5 Rose Quarter project does not offer a good return on investment. Existing infrastructure is in need of maintenance, and capital expenditure on additional infrastructure is irresponsible. This is not a correct prioritization of public funds given the State's policy goals. While improving interstate commerce is a valid goal, we are already developing a congestion pricing scheme that will be a revenue generator, rather than a net cost.

Urban Design Problems / Lack of Local Improvements

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

The triangular remnants of land provided by the lids proposed appear to be the result of engineering expediency and not the result of any intentional design aimed at creating usable public space. The renderings presented by ODOT and PBOT depict glorified traffic islands isolated by high traffic rights-of-way. We would recommend visiting the triangular diverter where MLK and Grand merge at NE Hancock to see just how we can expect these spaces to be utilized.

ODOT staff have stated that they are looking for ideas for what to put on the lids - we have given you ideas. Specifically we need to see buildings and usable public open spaces on top of the freeway if we are to stitch this neighborhood back together over the freeway. Seattle's Freeway Park (Designed by Lawrence Halprin of Keller Fountain fame) and the adjacent Washington State Convention Center show that this is possible. Spaces that are not accessible and have no active programming are not going to be used and seem destined to be abandoned and ignored by all but those with no other place to sleep (again, consider the MLK/Grand/Hancock triangle).

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

Misalignment with Portland's Goals

Portland has adopted Vision Zero, a Climate Action Plan and mode-split goals. The I-5 Rose Quarter project is anathema to all of these. The project is a 20th century transportation solution in a world of 21st century problems. The net outcome will inevitably be higher regional vehicle miles traveled (VMT), which is highly correlated with traffic fatalities. More VMT also will



inevitably lead to higher CO2 emissions, which undermines our climate change goals. Making it faster and easier to drive has

historically always led to more driving. This violates our mode-split goals. The direct fiscal costs of the project, while high, pale before those of the externalities and the opportunity costs of this investment.

Attachments: [2019 0331 Eliot LUTC Chair ATT](#)

2019 0315 Elise

Comment: Freeway expansion is climate denialism and won't improve congestion. There's really nothing more to say than that. We need to find alternatives.

Attachments: N/A

2019 0401 Elissa Gertler

Oregon Metro

Comment: Thank you for the opportunity to review and comment on the I-5 Rose Quarter Improvement Project Environmental Assessment. We congratulate ODOT and FWHA on completion of this well-organized document that strikes a balance between accessibility and thoroughness.

This memo summarizes Metro staffs technical review of the EA and project documents. Rather than document all positive and critical comments, this memo focuses on major questions and concerns in the interest of brevity. In particular, Metro staff believes the EA is inadequate in its evaluation of serious crashes, including documentation of existing conditions and an analysis of how the alternatives compare on reducing serious crashes. This inadequacy means that project designs that can reduce deaths and life changing injuries are not being evaluated, despite direction from federal, state and regional policies.

Metro staff also recommends development and evaluation of new design concepts for the highway caps and a segment of Broadway, and has requests and recommendations related to transportation including clarification of analysis, evaluation of different design concepts, and consideration of additional mitigation measures.

Agency Coordination

- The process for releasing the full documentation and analysis within a 45-day review period without any prior review opportunities of technical work did not allow for a full review of the analysis by Metro staff. As the designated Metropolitan Planning Organization for the Portland region and the administrator of the regions urban growth boundary, Metro staff believes our agency should have been afforded the same opportunity as the City of Portland for prior review of technical reports on land use and transportation. Metro staffs comments are therefore based on a high level review rather than a complete understanding of the work.

Project Alternatives



- There are reasonably foreseeable options to the proposed highway caps that were not explored in the design concept screening process, such as reinforced caps or a tunnel-type structure that could support some forms of development. With more robust construction, capped areas could potentially support low-density construction that could activate what might otherwise be vacant, underutilized spaces; a tunnel-style treatment could potentially support more intensive development that would have a more transformative effect on the district. Further exploration of these design concepts in the environmental process is recommended.

- If more robust cap designs are evaluated as recommended, mixed-use development above the highway would be consistent with goals of the City of Portland's N/NE Quadrant Plan, which specifies zoning the capped areas for mixed commercial, employment, (or) residential; scale varies with building heights ranging from 2-10 stories. There is no discussion of the potential for structures on the highway caps in the EA, either in the preferred Build Alternative or the other explored alternatives. Metro staff recommends the projects environmental documentation either evaluate such development under NEPA or state that development of these air rights is not a federal action and therefore not subject to NEPA.

Environmental Justice

- The analysis fails to address whether the properties displaced by the project are facilities that serve or employ low-income or minority populations.

- The analysis should clearly define any changes in emissions including diesel and greenhouse gases to neighborhoods along the I-5 corridor from North Portland to the South Waterfront/Lair Hill area.

Land Use

- There is insufficient information about how well the proposed highway caps will functionally meet the City of Portland's adopted land use plans. Metro staff believes ODOT and FHWA should better document how the proposed design will provide public open space that offers genuine opportunities for recreation, relaxation and respite including details on management and maintenance of these spaces and air quality and noise levels on the caps.

Safety

- The EA analysis does not adequately address serious crashes, which is inconsistent with federal, state and regional policies to eliminate serious crashes. Oregon has adopted a safety target of achieving zero fatal and serious injury (Injury A) crashes by 2035 (Oregon Transportation Safety Action Plan, 2016). The Portland region also has an adopted Vision Zero target for 2035 (Regional Transportation Safety Strategy, 2018). Federal safety performance targets track crash rates for fatal and serious crashes. Focusing on comparing crash rates for all crashes to statewide averages for freeway segments - the majority of which are property damage only and minor injury - is not consistent with a focus on reducing fatal and serious injuries.

- While the EA states that the segment of I-5 between Interstate 405 (I-405) and Interstate 84 (I-84) experiences some of the highest vehicle crash rates in Oregon it does not provide



information on how the project area compares for serious crashes. Metro staff is not aware that the project area is an area of concern for serious crashes when compared to statewide averages.

- The EA does not include information on how the Build Alternative will reduce the number and severity of serious crashes occurring
- As indicated in Safety Technical Appendix B, the one fatal crash between 2011 and 2015 involved a pedestrian on the freeway. There were two similar crashes involving pedestrians in 2009 and 2010, outside of the study time frame, indicating a pattern rather than a random occurrence. The EA does not address this fatality or describe how the alternatives would address preventing fatalities of this type in the future.
- The information in Safety Technical Appendix C is inadequate to determining if the Build Alternative would address serious crashes at intersections.
- EA Page 6 states that, it is estimated that there would be approximately 10 percent more highway crashes under the No-Build Alternative as compared to existing conditions (ODOT 2019a). This analysis lumps together all crashes and does not clarify whether the Build Alternative would improve serious crashes.
- The EA does not investigate the relationship of time of day with crashes, especially serious crashes, which could impact design decisions. Not evaluating the relationship of congestion to overall crash rates and serious crash rates raises questions about the design solutions identified to address crashes, which are described as addressing congestion and safety simultaneously.
- Behavior is cited as a primary factor in all of the serious crashes, following too close, not paying attention, aggressive driving, speeding and alcohol. It is not clear how the design solutions in the Build Alternative will address behavior.
- EA Page 73 notes that lower crash rates on I-5 would occur under the Build vs. the No Build Alternative due to less stop and-go traffic and emergency braking, new auxiliary lanes providing drivers more time and space to merge, and new shoulders providing more room for disabled vehicles. While rear-end crashes occurring under congested conditions could benefit from the Build Alternative, it is not clear how serious crashes occurring in less congested conditions or serious crashes with behavior as a primary factor in the crash will be addressed.

Transportation/Design

- The EA states (section 3.2.2) that the project does not create new capacity or add substantial capacity to I-5. This statement is not objectively true and is potentially misleading; auxiliary lanes clearly add capacity, which can be calculated using Highway Capacity Manual procedures and other traffic analysis tools. Further environmental documentation could state the estimated change in link capacity if there is a need to document the scale of the change.
- The width of Broadway between Williams and 1st is shown as five (5) one-way motor vehicle lanes, which is incompatible with a multimodal, mixed-use environment, and may increase in poor driver behavior. Metro staff requests alternatives to this configuration be developed and further evaluated.



- The angular nature of the lid design relative to the street grid results in sidewalk segments with a very large buffer from the freeway below, and sidewalk segments that may lack any buffer. Metro staff recommends consideration of new lid designs that include landscaped buffer for all sidewalk segments in order to create effective pedestrian environments.

- The EA does not document whether the project considered the feasibility and cost of retaining both Hancock and Flint as overcrossings. Metro staff requests this scenario be evaluated for consideration.

- Since the full four-step travel demand model was not used for the project analysis, it is not clear whether the projected increases in VMT capture all the impacts of the project, including changes due to mode shift to motor vehicles. The limited subarea provided for review does not make it clear if the VMT analysis includes consideration of the regional system or simply reflects re-routing of vehicles within the limited subarea.

Metro staff requests clarification on the assumptions used in forecasting the projects impacts on regional tripmaking and the resulting effect on overall trip patterns including mode share.

- The evaluation of construction impacts does not include consideration of access for walking, bicycling, transit, and driving during construction of the project. Metro staff requests the project document how construction-period access will be addressed.

- Metro staff recommends the final Clackamas and Hancock bridge designs include direct connections without switchbacks on both sides, as well as consideration of stairway connecting Clackamas to Wheeler to allow more direct non-ADA pedestrian access.

- Metro staff recommends the project include a southbound bike lane on Williams between Broadway and Wheeler, to best connect with the Rose Quarter Transit Center and Moda Center.

- Metro staff requests clarification on how the signalization at Williams and Hancock would move bike riders from the right side to the left side, and how bike riders on Vancouver would transition from the right side of the street to the left side prior to Hancock.

- The project appears to remove a sidewalk on the west side of Vancouver north of Broadway, which would degrade the pedestrian environment on Vancouver. Metro staff requests the project retain that sidewalk and connect it directly to the crosswalk on the north side of Broadway.

- The EA indicates that bus and streetcar performance will be slowed due to signal phasing changes. Metro staff requests FHWA and ODOT consider additional ways to mitigate this impact, including the consideration of BAT lanes, transit only lanes, and signal modifications (including TSP) on Broadway and Weidler.

Economy

- The Executive Summary and Cumulative Impact Analysis of the Socioeconomics Technical Report indicates that community engagement events were held that discussed government services, economic opportunity, gentrification, historical injustice with past developments, agency distrust, and broken promises with development initiatives. Metro staff requests the



project document how it plans to address these concerns; that effort could be jointly developed with the City of Portland.

- Relevant economic information from Metros Economic Value Atlas is included on an attached page. FHWA and ODOT may find this information helpful.

General

- Future environmental review and project documentation should reference the recently adopted 2018 RTP. The EAs references to the 2014 RTP are appropriate because that is what the NEPA analysis is based on.

If you have any questions or would like to discuss any of these in more detail, please contact me at elissa.gertler@oregonmetro.gov.

Attachment: I-5 Rose Quarter Improvement Project EA Economic information from EVA:

Metros Economic Value Atlas provides an indication of tract-level conditions when it comes to these economic values. An assessment is provided below regarding the primary census tract for the API (Lloyd District tract). This information may be helpful for the project and its environmental review.

- Job Activity + Target Industries: Existing jobs in the census tract of the project area (18,600) are significantly higher than the average tract in the region (2,300). Area job growth over the last ten years (31%) is slightly lower than the average tract in the region (34%). The project area has a large number of goods-producing jobs (500) relative to the regional average (270) and there is a balance between both other tradable industry jobs (9,500) and local service/government jobs (8,600) with more than six times as many of these jobs than other areas of the region. The average size of business establishments (23 employees) is more than two times higher than other areas (10 employees). The project area also has high concentrations of jobs in three out of the six industries that Greater Portland Inc. targets for growth in the region. More than fifteen times as many clean tech jobs, four times as many software and media jobs, and two times as many athletic and outdoor industry jobs than the average tract. The area has few-to-none computer and electronics industry jobs and health science and technology jobs, but there are a fair number in metals and machinery (31 jobs) relative to the average (36 jobs).

- Market Connectivity: Average travel times to exit and entry points of the highway system in the project area (40 minutes) are less than the average tract (47 minutes) and the areas access to PDX airport (18 minutes) is much better than most areas of the region (28 minutes). To the extent that the project increases commute-time speeds and reduces travel times on I-5 without inducing additional demand, the improved access to exit/entry points of the highway system and PDX could offer some minor benefit to market connectivity for goods and people for those areas of the region that rely on this stretch of highway as a pass through connection or local connection to outside clients and customers.

- Labor Access: Workers with a BA make up a large share of area workforce (48%) relative to the average (37%), but the number of highly educated workers living in the immediate area



(900) is less than the average (1,200) and there are almost half as many workers with some college and four times less entry-level workers than the average.

- Job Access: There are almost two times as many jobs within a 30 minute commute (940,000) relative to the average tract (570,000 accessible jobs).

- Economic Inclusivity: The I-5 Rose Quarter Improvements Project falls in a project area with a long history of economic injustice. The poverty level is 28%, more than double the 13% average. Area median income growth (11.6%) is slightly higher than the average tract (10.7%), but the gap between high and low-income earners (0.47 GINI coefficient) is also higher than the average tract (0.41 GINI coefficient).

- Racial Diversity: The project area is slightly more diverse (17.4% that are people of color) than the average tract (13.6%), but the area is getting less diverse (2% decline in % people of color) relative to a slight increase (0.8% growth) in other areas of the region.

- Developability: The existing base of industrial and commercial square footage in the census tract for the project area (9,615 SF) is close to four times the average tract in the region (2421 SF). The Buildable Lands Inventory indicates that there are 28.5 acres of buildable industrial or commercial land. This is around 8 acres more than adjacent, centralized tracts despite being well below the average tract in the region (37 acres). Additionally, zoned unit capacity and market potential for housing (1,944 units) is more than double the average tract in the region (887 units). The same is true for existing density (FAR/acre).

- Livability: It takes 32 minutes to get to major job concentrations and major employers of the region by transit vs. 54 minutes for the average tract. The area is already much more walkable than most tracts in the region and a smaller share of households have access to a vehicle than the average tract.

- Market Activity: Area property values (\$5.4 million) and recent permit activity (923 housing units) are three times higher than the average tract (\$1.6 million, 327 permitted units).

- Affordability: There are a larger number of total rental units in the tract of the project area (1,200 units) relative to the average tract (740 units), but the share of households that are rent-burdened (53.81%) is higher than the average tract in the region (46.6%). For the limited number of homeowners, fewer are cost-burdened (7.34%) relative to the average tract (16.8%).

Attachments: [2019 0401 Elissa Gertler ATT](#)

2019 0401 Elizabeth

Comment: Climate change is important, why are we building more car infrastructure instead of rail or bike lanes? This will impact a middle school that is primarily low income families and minorities. I am requesting a full EIS, no build, and finding of significant impact.

Attachments: N/A



2019 0401 Elizabeth Bendeich

Comment: In this era of acknowledged dangerous climate change how can ODOT even think of freeway expansion. There is no evidence that widening freeways decreases congestion, but rather encourages more vehicles to be on the road. My major concern is with air quality, particularly near Harriet Tubman Middle School. This area already has the worst air quality in Portland. Widening the freeway will only make it worse.

Attachments: N/A

2019 0330 Elizabeth Grey

Comment: The Rose Quarter Expansion is a terrible idea. It won't solve congestion, but it will increase pollution in an area that's already suffering! Even if ODOT provided a full environmental impact statement, even if they shared full plans and data with the community, that \$500M would be better spent on projects that improve public health and don't ignore the realities of climate change.

Attachments: N/A

2019 0316 Elizabeth Hardee

Comment: Hello,

I am writing today as a citizen concerned about the proposed expansion of I5 in the Rose Quarter. There are many reasons I am opposed to this project:

1. Climate change: Put simply, we've run out of time to make the rapid shift to a low-carbon economy in order to avoid catastrophic levels of climate disruption, therefore any project that perpetuates the status quo is irresponsible. The city of Portland's climate action plan contains goals for reducing vehicle miles traveled, expanding safe access to public transit, walking and biking, and shifting costs to reflect the true impact of gas-powered travel, all of which this project fails to adequately address. If we're serious about being a model sustainable city, we have to think differently about how we get around- expanding freeways isn't the way to go.
2. Other types of pollution: I live on the east side and work downtown. Each day as I ride my bike in to work, I am worried about the vehicle pollution I'm riding through and how it may be impacting my health. And yet my worry probably pales in comparison to the parents of kids at Tubman school, or anyone suffering with asthma or other health problems. Expanding freeways expands their capacity for pollution, and increased pollution is dangerous for human health. Each day I take my breaks at Waterfront Park (itself a former thoroughfare for cars) and I wonder what it would be like to have a quiet green space on the other side of the river, instead of a noisy, smelly freeway that blocks our view of the mountain.
3. Cost: \$500 million dollars is a lot of money, and there are so many ways to spend it that don't prioritize cars over people. We could make Powell safer for pedestrians and cyclists, or create multimodal roadways to allow safer commutes using low-to-no-carbon transportation options, or



even put the money toward making public transit free. We limit ourselves by thinking the future will look the same as the past.

I hope that ODOT will fundamentally reconsider this project, and think creatively about the future of transportation in our state.

Thank you,

Attachments: N/A

2019 0331 Elizabeth Israel-Davis

Comment: Please do not waste all of this money to widen a stretch of I5. You can ask anyone who regularly carries a purse, and they will tell you that getting a bigger purse just leads to carrying around more stuff. Eventually that new, bigger purse is stuffed full and seems too small. Is the solution to get another, even bigger purse? Probably not.

I would like to see our city disinvest from infrastructure that encourages private car travel. I will admit that most of my travel around the city is in my own private car with just me in it. This is because it's the most convenient and affordable mode of travel for me and it really shouldn't be.

Please do not use all that money to support the environmentally damaging status quo. Please use it to fund fareless public transit, more public transit, and construction of bike infrastructure (such as protected lanes). I know it's not enough to achieve those goals, so please also tax me so that we can have all of the above.

I used to be so proud to live in Portland because I truly believed we were leaders in sustainability, carbon emission reduction, public transit, and bike transit. We've been slipping for quite awhile now and this freeway project will be one more nail in the coffin of the Portland that could have been.

Attachments: N/A

2019 0401 Ellen M Cusick

Comment: Many people have written you and said "NO" more eloquently than I can. I just want to say that the widening of I-5 at the Rose Quarter is a terrible idea and ask ODOT to consider spending this exorbitant amount of money on something more climate-crisis-oriented and kinder to the air around my office and my home. Please don't do this to my city.

Attachments: N/A

2019 0311 Ellen Mendoza

Comment: Hey ODOT, Don't do this. It won't help, We have enough pollution. People have to get out of their cars. This will not help congestion. This will not help the neighborhood. Please don't do this.

Attachments: N/A



2019 0327 Ellen Mendoza

Comment: When Joni sang they paved paradise and put up a parking lot, I didn't think we'd be singing that song nearly fifty years later, When they killed the freeway to Gresham in the eighties, I thought we would have learned that lesson for good,

When New York City might finally start congestion pricing I wouldn't think Portland and ODOT would be going back to Flintstone ideas. I endure my share of traffic in a car, but I don't think the solution is more lanes of asphalt, or concrete.

Attachments: N/A

2019 0317 Ellen Mickle

Comment: As someone who uses the Flint Ave crossing daily on my bike commute to work, I oppose the Rose Quarter Freeway Expansion not only because it would impact the course of my route, but because it would worsen air quality. Air quality is already quite poor since we have no restrictions on old dirty diesel engines on or off-road (which hopefully is changing w/ HB2007) and our physical geography is doing us no favors in this regard. The fact that students from Harriet Tubman middle school would be advised not to go to recess should be a dealbreaker. I recall my mom, who grew up in LA in the 60s-70s, sharing how they often couldn't go out to recess due to smog. Do we really want to regress to that era? These students are 40% African American, so there's clearly a racial equity reason not to do this. Finally, we need to start figuring out how to drive less, not more, in the wake of the IPCC report last fall telling us we've got 11 years to limit fossil fuel use to keep climate change to moderate levels, and with the knowledge that transportation = 40% of our state's emissions. This is a serious issue which should compell ODOT to evaluate alternatives, some of which should be bold new ways of thinking, since we do not have the option of taking our old ways in to the future. Thank you for your time.

Attachments: N/A

2019 0401 Ellie Harmon

Comment: Hello, I am writing to urge you to reconsider the freeway expansion plans for I5 in the Rose Quarter. As you surely know from many historical case studies, freeway widening results not in congestion relief but, through induced demand, in greater congestion long term. More importantly, however, this freeay cuts through the core of our city, a location which should be activated with life and human activities but instead is cut apart and filled with traffic and pollution. It is exceptionally disingenuous that you used the CRC in your modelling and have not completed a full Environmental Imoact Statement. Both of these major issues must be corrected before any further work on this project.

Attachments: N/A



2019 0312 Elliot Akwai-Scott

School Advisory Committee for the City of Portland

Comment: Mr. Windsheimer and Commissioner Eudaly, my name is Elliot Akwai-Scott. I'm the vice-chair for the School Advisory Committee for the City of Portland. Before I dig into why this project fails bicyclists, I have to say we shouldn't even be discussing a freeway expansion project in this neighborhood that doesn't include reparations and a continuous buildable freeway that's in accordance to the Albina Vision. Also the climate impact -- the climate technical assessment, the environmental impact assessment only forecasts a .2 percent decrease in emissions from the build versus the no-build. This is all just efficiency out of vehicle movements and it fails to account for any induced demands. All of these forecasts are built off of the estimates based on current daily traffic volumes, which will obviously increase and so that estimate is clearly flawed. So after reviewing the environmental assessment technical reports, the only responsible choice is the no-build alternative, contrary to what the executive summary may tell you, this project fails to deliver any meaningful improvements for bicyclists. This project area contains the most heavily used bicycle facilities in the city, and would essentially rebuild facilities on streets where they already exist. For five years of construction on this project, we would introduce massive delays and detours for the over 5,000 cyclists per day that use Vancouver and Williams in an area where connectivity is already extremely limited. Construction on I-5 ramps and I-84 in the Willamette River would also close these for an unknown duration. The only other place in the city you could have as much destruction on bicycle travel is if you plucked the Hawthorne Bridge out of the water for half a decade. Bicyclists and pedestrians will continue to experience all the hazards associated with the freeway interchange after the project is complete, including wide turning radiuses and level turn lanes, including prohibiting crossing limits and increased grades. The no-build alternative offers better conditions for cyclists at no cost, not half a billion dollars.

Attachments: N/A

2019 0322 Elliot Akwai-Scott

Portland Bicycle Advisory Committee

Comment: As a citizen committee representing a broad spectrum of Portlanders advising the City on matters related to bicycling, the Portland Bicycle Advisory Committee (BAC) is writing to strongly recommend the No-Build Alternative for I-5 Rose Quarter Improvement Project.

While the project in its current configuration should not be built, the Albina neighborhood is not without need. Albina Vision, a community-created and led plan to heal the neighborhood devastated by the construction of the I-5 freeway decades ago, should be the starting point for a new vision of a vibrant, prosperous neighborhood between the Willamette River and Lloyd District.

Throughout the I-5 Rose Quarter project, obfuscation and delay in providing information for public review has hampered the ability of the community and stakeholders, including the BAC,



to provide meaningful input. This includes key information not released at the beginning of the Environmental Assessment 45-day public comment period. Transportation modeling assumptions were not released until 20 days after the beginning of the comment period. Partial engineering drawings were released yesterday with only 10 days remaining in the comment period, while fully detailed drawings have still not been released as of the writing of this letter. The BAC joins the call for a full Environmental Impact Statement before the project proceeds any further.

Based on the limited information provided, the BAC finds that the Build Alternative would fail to achieve the stated project goals and objectives, especially in critical areas related to bicycling, but also including the resulting

conditions for walking and transit, local connectivity, safety, equity, and climate outcomes. This is in direct conflict with city and state planning goals. Throughout the I-5 Rose Quarter project area, the Build Alternative would mostly propose rebuilding bicycle facilities on the same streets that already have them, except in some places like the Flint Ave overcrossing, currently used by 3,000 bicyclists per day, which would be permanently removed. During five years of construction, “multimodal conflicts could increase [and] bicycle detour options would be limited” for the 8,000+ people who currently bicycle through the project area every day, according to the Active Transportation Technical Report. We have serious concerns about whether it is possible to support existing bicycle travel patterns during construction, as Active Transportation Technical Report Section 6.2.1 identifies: “The CPC [Construction Phasing Concept] Plan does not address the following:

- Design details for temporary pedestrian/bicycle facilities (e.g., facility typologies, widths, and signage)
- Details for maintaining pedestrian and bicycle movement throughout the entirety of the Project’s construction timeline” For people walking and biking the city’s Waterfront loop, the Eastbank Esplanade would be closed for an

unknown duration to complete work in the Willamette River supporting portions of the freeway that are designated for expansion as part of this project. Requiring bicyclists to leave existing paths or bike lanes to ride in mixed traffic detours during a five-year construction period would increase travel times and reduce safety.

After five years of construction, the Build Alternative would not offer compelling or substantial improvements for bicycling. The predominant bicycle travel pattern through the project area is between downtown Portland and all of North and Northeast Portland north of I-84, via the Broadway and Steel Bridges. Under the Build Alternative, the majority of bicycle trips through the project area would experience increased delays due to signalization, reduced connectivity, longer travel distances, and steeper grades compared to existing routes under the No-Build Alternative. The removal of the Flint Ave crossing, which currently supports the lion’s share of westbound bicycle trips from Vancouver Ave and the Tillamook neighborhood greenway into downtown Portland, would have a negative impact on bicycle travel that cannot be replaced by any of the facilities proposed in the Build alternative. The Hancock/Dixon crossing proposed by the project would not include any separate bicycle facilities



and would be constructed at a permanently inaccessible 10% grade. The Clackamas bicycle and pedestrian bridge proposed by the project does not support this travel pattern, and would not replace any of the decreased utility of existing bicycle facilities impacted in the project area.

Many existing street design issues facing people bicycling and walking, such as exposure to double turn lanes and wide curb radii at freeway ramp intersections, would not be addressed in the Build Alternative. These proposed designs rate bicycle and pedestrian movements as a lower priority than vehicle movements, requiring two-stage crossings and increasing delay. Some facilities planned in the Build Alternative are touted as improvements over existing conditions, but build in problems that cannot be solved by any later design, such as the proposed two-way multi-use separated facility on the rebuilt Williams Ave crossing. Transitions back to one-way facilities on either side of the project area can only be achieved by additional signalization and accompanying increased delay. These design features do not belong on designated Major City Bikeways like Broadway/Weidler and Vancouver/Williams, which according to the Portland Transportation System Plan should be designed to “minimize delays by emphasizing the movement of bicycles.” The proposed bicycle facilities in the I-5 Rose Quarter project fail to provide meaningful safety improvements, improve travel times for bicyclists, or encourage the desired city-wide bicycle mode splits. To reach the city’s bicycle mode share goal of 25% adopted in the Transportation System Plan, permanent infrastructure at key regional transportation hubs like Albina must not only support existing bicycle travel patterns, but future growth.

Directly in conflict with the City’s goals, the Build Alternative would reduce the existing capacity of the bicycle network in the project area and place a permanent cap on the capacity for bicycle travel between downtown and North and Northeast Portland via the Broadway and Steel Bridges.

While the BAC is primarily responsible for advising the Portland Bureau of Transportation and Portland City Council on matters related to bicycling, transportation issues are multimodal, and transportation funding is finite. Walking, bicycling and transit all support each other as complementary modes that increase equity, livability, safety and efficiency. Transportation projects deserve funding based on cost effectiveness at achieving overarching transportation and land use planning goals, which increasingly focus on mitigating climate change. The BAC also supports the No-Build Alternative for these related reasons:

- Similar to outcomes for bicycling, bus travel times through the project area under the Build Alternative

would increase for many routes according to the Transit Technical Report, decreasing the viability of transit in the project area.

- While funding for the I-5 Rose Quarter project was assigned by HB 2017, the project budget is unclear. There is no reference to the overall project budget in the 38-page Environmental Assessment Executive Summary. Any cost to Portland when the project cost exceeds this amount would reduce the City’s ability to build more impactful bicycling, walking and transit improvements.

- Technical Report sections 6.3.2.2, Reasonably Foreseeable Future Actions, a required portion of the alternatives analysis for the Build and No-Build Alternatives of the Environmental



Assessment, do not include the implementation of value (congestion) pricing on the freeway system in the Portland area. A study of value pricing was included in the same bill, HB 2017, that funded this I-5 Rose Quarter project. Any analysis is incomplete without considering the effects of value pricing on the project area.

- Areas outside of streets on proposed freeways lids have been shown as green and landscaped public spaces, but lack accessibility. Portland Parks and Recreation has not been included as a project partner for programming and support of these areas after construction. The project has not demonstrated that the freeway lids will be designed to support the infrastructure necessary to meaningful public spaces in these areas, such as the depth of a growing medium necessary to support trees, or irrigation for landscaping.
- The Climate Change Technical Report, which appears to be a limited analysis on only freeway traffic rather than considering the outcomes for climate-friendly walking, bicycling and transit trips that cross it, and based on an unsupported assumption that 2045 traffic volumes will be the same as 2017, projects only a 0.2% reduction in carbon emissions over No Build. This is incompatible with the recent UN IPCC report that found carbon emissions must be reduced by 50 percent by 2030, and to zero by 2050.
- While the I-5 Rose Quarter project has been billed as a safety project, no fatal crashes have occurred in the project area since 2009. The victim of the fatal crash in 2009 was a pedestrian attempting to cross the freeway in an area where no crossings were available. According to PBOT data from 2010-2018, 133 people walking and bicycling have died on other Portland streets since then. As a regional multimodal hub, the transportation network in Albina is overdue for investment that reflects the city's and state's current transportation planning goals and priorities. This investment should prioritize equity, active transportation, transit, and safety. Instead, the I-5 Rose Quarter project is a freeway expansion, and a failed attempt to patch local connections, bicycling, walking and transit facilities back together afterward. For these reasons, we strongly endorse the No-Build alternative for I-5 Rose Quarter Improvement Project .

Attachments: [2019 0322 Elliot Akwai-Scott \(Portland Bicycle Advisory Committee\)](#)

2019 0314 Elly Blue

Comment: I have been following the proposals for freeway expansion in the Rose Quarter with some concern, and am writing to you to urge you to pursue alternate investments.

I am a retail business owner in the Eliot neighborhood with an on-site staff of 12, at least eight of whom at any given time commute daily by bicycle, transit, and walking across the area affected by the proposed I-5 expansion project. Of these, several also suffer from severe asthma. Part of our business is open to the public, and the majority of our customers arrive without cars. We all suffer the deleterious effects of proximity to I-5.

The impact of the proposed Rose Quarter project, including both the construction and the existence of the finished project will result in decreased transportation options and an increase in traffic as well as air and noise pollution that is all already well above tolerable levels.



It is clear from the lines of frustrated car commuters driving poorly near the on- and off-ramps for I-5 that something must change, and I agree that it must. As someone who has spent years writing about these issues, I understand all too well that this is an expensive solution that will provide some short-term jobs at the cost of the long term health and economy of this neighborhood and region.

My 2012 book, *Bikenomics*, contains a chapter debunking the myth that we can build our way out of congestion, and several other chapters about the dismal health, labor, environmental, and safety impacts of massive road projects such as this one. As an Oregon taxpayer, I can only see this as a massive waste. Worse, its a future liability when we cannot even afford to maintain the roads we have now, and when our air and water are already polluted beyond acceptable levels and our climate is at a tipping point.

Please consider implementing congestion pricing instead, and investing the revenue in non-car transportation projects. These create more jobs per capita than road work and can provide affordable transportation options for all Oregonians. In past decades, this state has been a national and even global leader in making forward-thinking, sustainable choices. For our own future and that of younger generations, I hope that this shortsighted project can be put to rest and the research and preparation behind it used to make the case for a transportation system that is aligned with Oregon's environmental goals and legacy.

Attachments: [2019 0314 Elly Blue ATT](#)

2019 0401 Emee Pumarega

Comment: I'm a mom and a business owner, and I am strongly against the I-5 expansion as proposed by ODOT. The environmental assessment by ODOT is riddled with errors, inconsistencies, and falsehoods. That alone should be grounds to have this thrown out. But even if the assessment was true, Portland doesn't need another freeway. A freeway expansion goes against everything Portland should be standing up for -- the environment, multimodal living, and racial equity. Portland has a rich and proud history of killing freeways and has done just fine. Let's kill this freeway too and dream bigger, of a climate-just and progressive future.

Attachments: N/A

2019 0401 Emily Cain

Comment: I am both a driver and a cyclist and I do not want a freeway expansion. We should be funding better public transit and bike infrastructure, and affordable housing so that people can afford to live near work/school. We should not be expanding a freeway that will pollute Harriet Tubman Elementary School and increase our carbon emissions.

Attachments: N/A

2019 0312 Emily Chenoweth

Comment: To Whom It May Concern:



We live in an age of undeniable and potentially catastrophic climate change, and it is our duty to preserve the world (as best as we can) for our children. To consider a freeway expansion in a time like this goes beyond folly. It is a willful denial of both common sense and the science of climate change.

Decongestion pricing is the only policy actually proven to reduce traffic congestion; its also proven to improve air quality and reduce carbon emissions. What is not at all proven is ODOT's assertions that this project would meet the same goals. ODOT won't release supporting data--perhaps because it isn't there.

\$500 million could build sidewalks in East Portland, bus rapid transit lines across town, or go 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.

And let's not forget that the proposed freeway will go right through the backyard of a predominately African-American school--meaning this isn't just a matter of fossil fuel infrastructure; it's also a matter of social justice.

Portland doesn't want a wider freeway. Don't let it happen.

Attachments: N/A

2019 0307 Emily Guise

Comment: I am against this project. I am not convinced that this Environmental Assessment was enough to calculate the effects of this project on our community. There are so many unknowns at this point, and the fact that carbon emissions would be lowered without the project due to increased vehicle efficiency is very concerning.

Attachments: N/A

2019 0320 Emily Guise

Comment: I do not support this project. If ODOT would really like to reduce congestion and improve safety, they could study an alternative of this project that includes congestion pricing. The Oregon Legislature has directed the agency to do so, and congestion pricing is a known traffic management tool used throughout the world that results in substantial reduction in vehicle volume. It's very likely that implementing congestion pricing would allow this project to meet it's goal of more freely moving vehicles without widening the freeway.

Attachments: N/A

2019 0401 Emily Guise Ted Buehler Catie Gould

Bike Loud PDX

Comment: BikeLoudPDX, a Portland-based grassroots bicycle advocacy group, remains firmly opposed to building the I-5 Rose Quarter Freeway Expansion project after reviewing the



Environmental Assessment and its appendices. There is simply no data provided in these documents showing that the freeway widening project will accomplish its goals of relieving congestion, improving safety, or reconnecting the lower Albina neighborhood. As advocates for making Portland a better place to ride a bike, this project is oppositional to our organization's mission. For the following reasons we request that the Oregon Department of Transportation (ODOT) move forward with pursuing an Environmental Impact Statement to better understand the significant impacts to the neighborhood, region and planet. We have specific concerns about the following:

The need . The need for the project is poorly demonstrated, with misleading claims about its ability to provide congestion relief and safety improvement. Restorative justice . The project's efforts to connect the lower Albina neighborhood are not substantive, yet the harm that the project will cause is. Acknowledging past harm while proceeding with a project that will further divide and degrade the neighborhood is not restoring or repairing it in a meaningful way. Surface street improvements. Efforts to improve surface streets are flawed with a coarse methodology that fails to accurately assess existing conditions, and inadequately recognizes the parameters of excellent bikeway networks. The poor proposed infrastructure that is not a material improvement over existing conditions and represents a significant degradation of many existing routes. BikeLoud joins the numerous transportation advocacy groups in the city in opposing this project and demanding an Environmental Impact Statement. The I-5 Rose Quarter project will not deliver on the promises made. BikeLoudPDX joins other transportation advocacy groups, such as the City's Pedestrian Advisory Committee, Bicycle Advisory Committee, Oregon Walks, Community Cycling Center, the Portland Bus Lane Project, The Street Trust and No More Freeway Expansions in firmly stating that this project falls demonstrably short of providing meaningful improvements for people biking, walking, or taking transit through the neighborhood. The current proposal, especially for the active transportation surface facilities, is not worth investing \$500 million. BikeLoudPDX cannot support this project without ODOT first addressing the meaningful, significant negative impacts this freeway expansion will have by conducting a more rigorous Environmental Impact Statement that answers our concerns. Future study and proposals for this freeway expansion must significantly improve the proposed active transportation infrastructure plans, demonstrate a more rigorous active transportation design standards methodology, be able to show that delays during the estimated five year construction period not significantly impact active transportation and transit in the project area. NOTE: Attachment contains lengthy submittal with numerous comments. See attachment.

Attachments: [2019 0401 Emily Guise Ted Buehler Catie Gould ATT](#)

2019 0401 Emily Guise Ted Buehler Catie Gould 2

Bike Loud PDX

Comment: Thanks for coming out to our Die-In to call attention to Oregon roadway fatalities. We hope we influenced you at least a little bit to try to focus more on safety and less on speed and throughput. We are attaching our comments on the I-5 Rose Quarter EA.



We are very concerned that the performance measures for bikeway system evaluation were not adequately established. Bikeways need to be wide, fast, straight, and easy to navigate. And as much as possible stay away from the termini of freeway ramps.

While the EA discusses these needs, there is nothing in there that establishes a meaningful performance measure. As a result, the designs proposed are often inadequate for today's bicycle traffic, and will neither facilitate nor allow for the 200% increase in bicycle traffic sought by the City of Portland for the area. Please consider our comments, and send the requests for better bikeway performance measures down the line to your staff.

BikeLoudPDX, a Portland-based grassroots bicycle advocacy group, remains firmly opposed to building the I-5 Rose Quarter Freeway Expansion project after reviewing the Environmental Assessment and its appendices. There is simply no data provided in these documents showing that the freeway widening project will accomplish its goals of relieving congestion, improving safety, or reconnecting the lower Albina neighborhood. As advocates for making Portland a better place to ride a bike, this project is oppositional to our organization's mission. For the following reasons we request that the Oregon Department of Transportation (ODOT) move forward with pursuing an Environmental Impact Statement to better understand the significant impacts to the neighborhood, region and planet. We have specific concerns about the following:

The need . The need for the project is poorly demonstrated, with misleading claims about its ability to provide congestion relief and safety improvement.

Restorative justice . The project's efforts to connect the lower Albina neighborhood are not substantive, yet the harm that the project will cause is. Acknowledging past harm while proceeding with a project that will further divide and degrade the neighborhood is not restoring or repairing it in a meaningful way.

Surface street improvements. Efforts to improve surface streets are flawed with a coarse methodology that fails to accurately assess existing conditions, and inadequately recognizes the parameters of excellent bikeway networks. The poor proposed infrastructure that is not a material improvement over existing conditions and represents a significant degradation of many existing routes. BikeLoud joins the numerous transportation advocacy groups in the city in opposing this project and demanding an Environmental Impact Statement.

The I-5 Rose Quarter project will not deliver on the promises made. BikeLoudPDX joins other transportation advocacy groups, such as the City's Pedestrian Advisory Committee, Bicycle Advisory Committee, Oregon Walks, Community Cycling Center, the Portland Bus Lane Project, The Street Trust and No More Freeway Expansions in firmly stating that this project falls demonstrably short of providing meaningful improvements for people biking, walking, or taking transit through the neighborhood. The current proposal, especially for the active transportation surface facilities, is not worth investing \$500 million. BikeLoudPDX cannot support this project without ODOT first addressing the meaningful, significant negative impacts this freeway expansion will have by conducting a more rigorous Environmental Impact Statement that answers our concerns. Future study and proposals for this freeway expansion must significantly improve the proposed active transportation infrastructure plans, demonstrate a more rigorous active transportation design standards methodology, be able to show that delays during the



estimated five year construction period not significantly impact active transportation and transit in the project area.

Attachments: [2019 0401 Emily Guise Ted Buehler Catie Gould 2 ATT](#)

2019 0329 Emily Offerdahl

Comment: I used to be a daily trimet rider until we moved further into Northeast Portland. Buses going directly to downtown Portland dont service my neighborhood. I chose to start driving bc I wanted to spend more time at home with my daughter and less time on my commute. I use this corridor to get to work and I dont want it to expand. I want more transit routes for buses and expansion of the Max. My bus commute became longer and longer because more and more cars were on the road, not because there isnt enough space on the freeway. Please create incentives for public transportation and increase ridership, please do not enable people who drive cars to keep driving them. Create bus routes that are fast, accessible and become replacements for car travel within and around the Portland metro.

Attachments: N/A

2019 0310 Emily Platt

Comment: I am adamantly opposed to the I-5 freeway expansion. The time of transportation infrastructure being only for the comfort and convenience of the automobile must come to an end. We are living through a climate crisis and we must do all that we can to reduce carbon emissions. 40% of carbon emissions come from the transportation sector, this number must be reduced, not increased. Everyone, including ODOT, knows that expanding freeways does nothing to decrease congestion. However, congestion pricing would reduce congestion and carbon emissions. I will close by stating that this project benefits wealthy commuters from Clark County (see Willamette Week of 03/06/19) and not the residents who have to live with the degradation of air quality and quality of life, including the students at Harriet Tubman Middle School. The 500 million would be better spent on supporting a world-class public transportation system.

Attachments: N/A

2019 0226 Emily Schield

Comment: Please don't move forward with this. Harriet Tubman is our neighborhood school and I am already concerned that our children will suffer the environmental impacts of increased congestion. Add a toll to the freeway, increase bike access, expand transit - anything but this.

Attachments: N/A

2019 0329 Emily von W Gilbert

Comment: Expanding the freeway is the LAST thing we should even be discussing and I'm very disappointed that leadership is taking so long to see the light on this. Induced demand will lead



to more traffic, more congestion, more pollution. We need a significant shift away from our unsustainable level of reliance on SOVs and invest in clean public transit TODAY.

Attachments: N/A

2019 0302 Emily Wahl

Comment: To Whom It May Concern,

I am writing to oppose the freeway expansion in the Rose Quarter of Portland.

Climate change is the most dangerous threat that our world, our city, and our state is currently facing. I ask our Department of Transportation to help stop catastrophic climate change, as transportation emissions are one of its biggest causes.

Instead of expanding freeways to allow more combustion engines on the road, please seek a carbon neutral or carbon reducing transportation solution. Implementing a decongestion charge on this section of freeway would effectively reduce congestion and the funds could be used to build more public transit options and biking and pedestrian infrastructure.

Both the harm that the added carbon emissions would cause and the even more immediate danger of toxic air pollutants that will harm students at Harriet Tubman Middle School makes this freeway expansion extremely dangerous to our public health and safety, while doing nothing to solve the transportation problem, as your consultants have informed you.

Please start implementing the necessary, effective and new solutions that we so desperately need.

Thank you,

Emily Wahl

Attachments: N/A

2019 0223 Eric Boardman

Comment: I'm a N Portland resident and have a child attending Tubman Middle School next year. I'm strongly against any highway widening project, including the proposed I-5 RQ project. We all know that adding highway capacity does not reduce congestion in the long-term. If you want to spend money in the RQ area, spend it on bike, pedestrian and mass-transit infrastructure and allow for construction of high-density residential housing.

Attachments: N/A

2019 0329 Eric Casteleijn

Comment: Please do not expand the freeways going through Portland.

Freeway expansion has never been shown to help with congestion in the US or elsewhere, and it will increase pollution in the city.



Instead we should invest in green public transit and biking options to make them viable for commuting for everyone, regardless of income or disabilities.

Portland is a progressive city in some ways, but we can still do much better. There are many cities around the world that we can learn from that have increased livability by limiting (or even eliminating) car access. While this is hard to do in sprawling metro areas, Portland is small enough that if we can improve if we invest wisely, rather than in near sighted ineffective measures.

Attachments: N/A

2019 0219 Eric Cross

Comment: This is entirely the wrong way to go about solving the traffic problem. Freeways have been expanded upon and further expanded upon...but here we are. The solution is reducing the demand for the freeway!

Thank you for listening,

Eric

Attachments: N/A

2019 0314 Eric Dodson

Comment: Im opposed to this version of the freeway expansion because of the lack of transparent data and the disregard of actual community transit, such as biking routes. I want to see the focus on environmentally sound, evidence-based urban planning and transit principles.

Attachments: N/A

2019 0329 Erik Furlong

Foster-Powell Neighborhood Association

Comment: This letter is a notification of the Foster-Powell Neighborhood Associations (FPNA) opposition to the I-5 Rose Quarter project.

On 11 March 2019 the Foster-Powell Neighborhood Association held their monthly meeting and one of the agenda items was a presentation by Aaron Brown from the grassroots advocacy organization No More Freeways PDX. Following the presentation, the assembled members asked questions of Aaron, discussed the I-5 Rose Quarter project, deliberated, and then took a vote. The vote was whether to make a formal statement of opposition against the I-5 Rose Quarter project. The vote in opposition was unanimous with one caveat, which was that the FPNA would publicize a survey and ask neighbors to respond in either opposition or support



of the project. The survey was available for 2 weeks and after completion this past Monday, the results were that more than 60% of the survey respondents did oppose the project, which was the agreed upon threshold for the publication of this letter.

There are many reasons why this project should not move forward, but the key reasons that resonated with the assembled members of the FPNA were:

- Due to the well-documented phenomenon of Induced Demand, the freeway expansion would not actually reduce congestion, which is the purported benefit.
- Given our limited time to halt carbon emissions to avoid a climate catastrophe, we should not be building and expanding on carbon-based transportation systems. Forty percent of Oregon's carbon emissions come from transportation and it is the only sector of Oregon's economy where greenhouse gas emissions are increasing.
- The \$500 million allocated for the freeway expansion could be better used to address other issues in our transportation system, specifically the money could go towards other key projects such as mass transit improvements and the jurisdictional transfer of SE Powell Blvd and SE 82nd Ave, which border Foster-Powell. These arterials, currently owned by ODOT, have significantly higher rates of traffic fatalities and serious collisions than the Rose Quarter Freeway. FPNA supports the city's Vision Zero initiatives and believe transportation funding should prioritize eliminating traffic violence from our streets.

ODOT should undertake an Environmental Impact Study that more fully explores the alternatives to expanding this freeway, including how the implementation of congestion pricing would impact traffic patterns through this freeway.

Attachments: [2019 0329 Erik Furlong ATT](#)

2019 0402 Eric Gerhardt

Comment: Folks,

We do not need a wider I-5. You seriously propose to spend half a billion dollars to encourage more driving and more pollution? What year is it, anyway?

Spending increasingly limited public funds to encourage driving, particularly at the expense of other priorities like public spaces and public transport, is exactly the opposite direction we need to be moving in.



The Portland I love -- progressive, eco-friendly, trend-setting, quality-of-life-prioritizing Portland - has lost its way. We used to set an example for other cities. We desperately need to find that forward-thinking mentality again. More cars and more driving is not forward thinking.

Try again please.

Attachments: N/A

2019 0326 Eric Gold

Comment: I am writing as a resident of North Portland just a couple of blocks from I-5. The traffic on this freeway (much of it commuters from out of state) is already a threat to public health in the neighborhood.

Oregon needs to invest in the solutions of the future, not colossal mistakes of the past such as freeways and private cars.

If you widen the freeway, it won't help congestion. You'll just have a wider freeway that is also packed to capacity for many hours a day.

Please do not expand I-5.

Attachments: N/A

2019 0329 Eric Grimm

Comment: 500 million is a waste of money if you can get the same results by adding tolls. We need to reduce carbon emissions, tolls create the incentive for alternatives to automobiles. There by saving money and reducing emissions.

Attachments: N/A

2019 0329 Eric Grimm

Comment: 500 million is a waste of money if you can get the same results by adding tolls. We need to reduce carbon emissions, tolls create the incentive for alternatives to automobiles. There by saving money and reducing emissions.

Attachments: N/A

2019 0312 Eric Kallio

Comment: I feel strongly that this is a bad use of 500M dollars. We don't need to be investing in ways to put more cars on the road. All this project does is serve people who own cars by potentially increasing the flow of traffic and pollution. Let's spend this money on public transportation, bikes lanes, and serving the Portland population as a whole. I understand that cities are places meant to facilitate commerce, but let's invest in ways that make this great city better for the communal transportation resources all Portlanders share.



Attachments: N/A

2019 0401 Eric L Lindsey

Comment: I am writing to urge you to change course on the current proposed expansion of I-5 at the Rose Quarter (lower Albina). Specifically, I am calling on you to conduct a full Environmental Impact Statement, preferably by an outside organization that will have the trust of all interested parties to be an honest and forthright arbiter.

I would write at length about the environmental, safety, and design concerns that I have, but others have addressed these with far greater acumen than I can muster. Suffice it to say: the idea that significantly increasing the size, capacity and speed of a freeway is going to improve the environment, improve safety and improve livability of the Rose Quarter is a ridiculous, farcical claim. This assertion is directly countered by both specific critiques of your proposed rebuild as well as the great body of research on urban freeway construction.

I think, however, that the more troubling problem with this process to date is the way in which ODOT has conducted itself towards the public. There have been multiple instances (as documented by OPB, the Willamette Week, City Observatory, and citizen journalists) of ODOT obfuscating, stonewalling or what looks like simply lying to the public about the existence or producibility of documents that would allow others to independently vet the claims made by ODOT about the Rose Quarter freeway expansion. Generally speaking, I find government entities are made up of good-hearted folks honestly trying to do their best under the constraints of law and policy. I give ODOT this same benefit of the doubt. While I still assume that most of the folks at ODOT are operating in good faith with respect to the proposed Rose Quarter Expansion, it can no longer be said that ODOT, as an organization, has credibility with respect to this project. I cannot speculate on the motives that led ODOT to so flagrantly violate the basic tenets of proactive transparency and fair-minded assessment, but I can offer one recommendation as to how this state of affairs might be remedied.

ODOT, we need you. We need you to be our partner in creating the awesome Oregon of tomorrow. But partnership demands trust. Your task now is to regain our trust. Find an organization, outside of your four walls, whose credibility and expertise in the relevant areas is beyond reproach. Hire them to do a full Environmental Impact Statement that considers as many varied futures and options for the Rose Quarter as possible. Then, we can all work together to build a Rose Quarter (lower Albina) that we can all be proud of.

Attachments: N/A

2019 0401 Eric Mandel

Comment: The planning process and information provided in this EAS is insufficient.

A full EIS should have been prepared, providing sufficient information for the public to comment on and for the officials to make educated decisions.



The plan development and public involvement process dates to 2010. Too much time has passed and the initiative should have been restarted.

A stated goal of the report was to: "Identify and address systemwide transportation impacts of proposed interchange improvements." It is unbelievable that the increased traffic flow / capacity that is forecasted to happen with the build scenario will not result in increased congestion at other notable points in the freeway system. Putting aside induced demand, the downstream congestion may negate the slim air quality benefits, and travel time savings identified in the report.

Despite the department's responsibility of educating the public as to the key assumptions of the report, it was not made clear until well into the public comment period that the traffic assumptions included major traffic improvements proposed in the regional transportation plan. That is a major assumption was missing from the majority of the public comment time.

While future transportation improvements (like tolling as a proven way to reduce congestion) should be taken into consideration as part of an environmental report, it should constitute a complimentary analysis. The critical analysis should be the project's effect on the system as it is built today.

This report sets dangerous precedent. If the negative consequence of the government's action under evaluation can be mitigated or offset by a hypothetical future action in an area outside the scope of the EAS, then it paves the way for complete circumvention of project evaluations. All projects could be shown to have no detrimental impacts as the government could devise plans to solve the problems with another project sometime in the future. The government can segment their actions with each segment and its EAS relying on some "future" segment of the freeway to be improved. And if the Rose Quarter traffic is so dependent on the traffic flow and in North Portland and over the Vancouver bridge, then the entirety of the I-5 corridor should have been modeled and evaluated.

The report is missing key figures as to the cost differential of capping the freeway, as proposed in the Albina Vision, in the build / no build scenarios. The proposal does not seem to resemble the vision as the caps supporting buildings are absent. It seems that a build scenario, with the width on travel lanes increased, would significantly increase the cost of building caps over the freeway to support buildings, as laid out in the Albina Vision. ODOT's presentations lead one to believe that it incorporates the Albina Vision. A quick check on the Albina Vision website shows that the process, in its current iteration, started in 2015. It seems like the "park" over the



freeway that is supposed to incorporate the Albina Vision, is left over from the Rose Quarter planning process documented in the section of the report dating to 2012.

ODOT is responsible to the public for using non-technical terms. ODOT has failed significantly on two terms central to the project. The first is "safety". From ODOT's presentations, an average citizen would think that people in the corridor suffer from injury, serious injury, or death at rates above average. It seems that this is technically not true. There are a lot of accidents but relatively little physical danger. It seems that ODOT is intentionally misleading the public by confusing the distinction of damage to cars and the safety of people. The presentation would also lead the average citizen to believe that the build scenario would reduce the number of injuries that do occur. It appears though that the majority of injuries would not be prevented as they were due to reckless driving or following too closely or inattention. These seem to be more behavioral problems of drivers that would not be fixed with the build scenario.

The second term is "widening." The average person would call six lanes wider than four. Despite the build scenario adding two lanes to the existing four, ODOT maintains that they are not widening the freeway. Either ODOT is intentionally misleading the public, or they are relying on technical distinctions between the freeway and auxiliary lanes. The report and presentation should call the project a freeway widening project, and rely on the expertise of the professionals involved to understand the technical aspects of the difference between an auxiliary lane and a freeway lane.

The report's findings on climate change are inadequate. "Climate Change Large reductions in greenhouse gas emissions are required to mitigate global climate change. . . .No additional mitigation is proposed" The government should not be able to neglect its responsibility in mitigating the impacts of its actions by relying on unproven and widespread implementation of mitigating factors. ODOT should provide a more robust analysis of the projects impact on Climate change.

It a time when the public is so confused over alternative facts ODOT should have been more transparent. The public was left with opponents of the project providing alternative facts - that the corridor was relatively safe when compared to of segments of the highway, that the freeway would be wider than before, that it would not solve congestion in the freeway system as the slowdown would be displaced, that it does not incorporate the Albina Vision. ODOT was not transparent about these key issues, suppressing data assumptions and turning what should have been common words "simple" and "widening" into technical terms.

I had wanted to contribute more but the ODOT web site is showing a 503 service unavailable error at the moment.

Attachments: N/A



2019 0306 Eric Mittman

Comment: Expanding highway infrastructure is undesirable for these reasons: 1) it incentivizes unnecessary driving and increases demand for fossil fuels and magnifies our pollution problem. 2) it is expensive to maintain; this will lead to good money chasing after bad. As a taxpayer, I object do to the proposed expansion of our roadway infrastructure in the Portland metro.

Attachments: N/A

2019 0325 Eric Mullendore

Comment: I strongly oppose the planned expansion/widening project on I-5 as it passes through the Lloyd District. I believe the many experts (including ODOTs own analysis) that this project will not substantially improve travel times or congestion through this section of freeway as it will encourage additional users to travel during peak periods. I also dont believe that the project is a good value for the city or state. The budgeted \$500M could be used for a number of more important projects including accessible curbs, earthquake proofing vital infrastructure, and bike/mass transit investments. This project does not support and actually works directly counter to the city or states environmental and equity goals. I urge ODOT to consider these objections along with the numerous other complaints Im sure have been submitted and cancel this wasteful and ill-conceived project.

Attachments: N/A

2019 0327 Eric O'Grady

Comment: I oppose the I5 Rose Quarter Freeway Expansion as it is a gross misallocation of funds that ultimately would not prove effective in solving the problem it aims to address. This investment would saddle our future with debt while not truly addressing the issue of congestion on the I5. Alternative measures aimed at reducing usage of single occupancy vehicles would prove more effective at reducing traffic problems rather than incentivizing their use by being even more accommodating. For these reasons I firmly oppose the expansion of the I5 Rose Quarter Freeway.

Attachments: N/A

2019 0329 Eric Putnam

Comment: Please, please, please reconsider this asinine and gigantic step in the wrong direction! There's no question that this expansion will *increase* traffic in the area, reduce air quality, life quality, and set our city back in its mission to move forward to a greener future. Anyone who drives through this city already has to deal with horrible traffic and all this expansion will do is provide more of the thing that everyone already hates. And in my opinion, anything that encourages or enables the burning of fossil fuels in today's world is ridiculous and should be stopped immediately. This highway expansion has to be stopped now.



Attachments: N/A

2019 0219 Eric Squires

Comment: Freeway congestion in Portland is painful. I am in support of expansions in the I-5 Rose Quarter area. The opposition is to be commended for their eloquent arguments. I have no transit access at home and an irregular schedule. Recreation often takes me to Mt. St. Helen's, and a sedan works for getting me and a well deserved cooler of food back and forth to the mountain, That can't happen via transit. As a real estate broker, I travel the entire tri-county area. This choke point needs work, and a sedan is my realistic answer to client expectations. Please expand capacity, or build the 605 Westside Bypass and I'll skip this mess entirely!

Attachments: N/A

2019 0327 Eric Squires

Comment: I'm in general support of expanding the I-5 Freeway at the Rose Quarter, and the halo of projects shown in the online charette here: <https://i5rosequarter.org>

I offer a suggestion that the "Third Bridge Option" providing another crossing over the Columbia River is a way that congestion at the study area could be mitigated. But that, and a "Westside Bypass" are not political realities right now.

Thanks for your efforts in addressing this issue that is mired in conflict.

Attachments: N/A

2019 0331 Eric Wheeler

Comment: Research has shown that building more freeways/interchanges etc increases the capacity AND ultimately more congestion. A waste of money. Tolling is one answer. Our local and state government should make it increasingly inconvenient and expensive to drive. Otherwise the automobile lifestyle will be increasingly untenable.

Attachments: N/A

2019 0402 Eric Wilhelm

Comment: This project needs to go back to the drawing board, do a full EIS, and evaluate options which move more people than cars. Widening highways has never solved traffic congestion and this widening is not worthwhile. Instead of years of roadwork, we should put lane/ramp tolling and carpool incentives in place before planning to build anything at the I-5 Rose Quarter Interchange. Any seismic investment will be more economical by spanning less width, and a buildable cap could contribute valuable real estate for local commerce (aka auto trip reduction) and affordable housing.



In widening the surface streets (for better clearing the offramps), the design brings many more cars onto these streets, making crossings more difficult for people walking or biking, and making transit less convenient. The highway already adds a significant barrier to local trips and bike/walk connections but more, wider surface streets and transit delays represent a significant impact to local trips. The Flint St bridge as a bike route connection is not adequately replaced by anything proposed. Steeper grades for bike connections will lead to more car traffic as people find they can no longer easily make those short trips by bike.

Instead of making room for more cars to be stuck in traffic, ODOT could use this money to save lives and reduce emissions on several highways in the Portland Metro area such as SW Barbur or SE 82nd by making these surface streets safe for people who are not in cars. This Environmental Assessment and public process was insufficient and we need to consider the opportunity cost of spending this money to increase rather than decrease CO2 emissions. We can't drive away from our climate action goals and expect our children to walk back.

The impact of this project on the Eastbank Esplanade, riverbank, and Harriet Tubman School are particularly concerning. Construction impact, added noise, and emissions in these locations are inexcusable. Besides making surface transportation more hazardous, this widening would also make all of these outdoor spaces even less hospitable. We can't spend the 21st century in cars, so we need to design accordingly.

Attachments: N/A

2019 0307 Erica Morris

Comment: 1. I feel that by increasing lanes to make traffic run faster will make people realize that their commute is faster so now they can drive their car. I live in Eliot area in the last 3 years I stopped going to Hayden I started to shop at Target etc. Because traffic has been so horrible getting ther. If I found out that lanes were added to make it easier to get to Hayden Island then I would go back to shopping there. This will increase traffic consumption on I-5. 2. We need more public transport infrastructure in order to inspire people to use it and not drive their cars. Adding lanes will enable ppl to drive more. More to Vancouver and commute. 3. Build a new bridge at the border of OR/WA. That will help! 4. Portland is supposed to be progressive and heading in the "green" environmental direction. Adding lanes is the wrong direction. 5. You must speak to the people from CA that think a 90 minute commute is legit. 6. The 'lids' over I-5 will become homeless camps.. what's your plan for deterring that? Why aren't they covered with trees to help the pollution?

Attachments: N/A

2019 0331 Erik Harper

Comment: This is a follow-up to my first submission. I request that this study include an "induced travel analysis" that will study the increase in the demand for traffic as a result of these changes. Considering statistics are not on the side of adding lanes resulting in a reduction in



traffic I think it should be a requirement that an analysis into how much induced demand will result from these changes, factoring in demographics and population projections as well.

Attachments: N/A

2019 0331 Erik Harper 2

Comment: I agree that safety is an issue on our highways and we should make improvements where need be to keep people safe on the road. I also believe that reducing cars on the road is an even safer strategy than making highway expansions. Increasing Transit is the primary tool for reducing cars on the road so why aren't we making plans to increase Trimet's footprint instead of extra lanes that studies (<https://usa.streetsblog.org/2017/06/21/the-science-is-clear-more-highways-equals-more-traffic-why-are-dots-still-ignoring-it/>) have shown over and over have absolutely ZERO impact on reducing traffic because of the "induced demand" effect? Portland needs to step up if we're going to meet our climate and livability goals. My point is simple: transit reduces our environmental impact and makes us happier. Period. We have an opportunity to lead again when it comes to bucking the "highway" trend just like we did back in the 60's and when we built Tom McCall Waterfront Park instead of a flippin highway through the middle of the city.

Attachments: N/A

2019 0401 Erica Malmen

PacWestEnergy

Comment: Perkins Coie LLP has been retained by PacWest Energy, LLC (PacWest) to provide initial comments on the environmental analysis prepared for the I-5 Rose Quarter Improvement Project. PacWest owns and operates a gas station and convenience store located at 15 NE Broadway Street, which is within the study area of the EA and will be directly impacted by the proposed "Build Alternative" identified in the EA. We appreciate this opportunity to provide comments on the Rose Quarter Improvement Project Environmental Assessment (EA).

The EA, issued by the Oregon Department of Transportation (ODOT) and the U.S. Department of Transportation, is a dense document complete with technical data, definitive and assumed conclusions, dozens of supporting technical and reference documents, and a broad range of acknowledged impacts ranging from aquatic biology to environmental justice and socioeconomics. In the limited time provided to review this comprehensive document, PacWest has identified a number of concerns and potential significant short and long-term impacts that are included in this letter. However, additional time and information will be necessary to compile a more exhaustive list of concerns.

A. Project impacts necessitate preparation of an Environmental Impact Statement.

The National Environmental Policy Act (NEPA), requires agencies to ensure fully informed decision-making and provide for public participation in environmental analysis and decision-making. 40 C.F.R. § 1500.1(b)–(c). NEPA serves two principal purposes: (1) it ensures that the



agency, in reaching its decision, will have available, and will carefully consider, detailed information concerning significant environmental impacts, and (2) it guarantees that the relevant information will be made available to the public so it may play a role in the decision-making process. This “hard look” at an action’s impacts fosters both informed decision-making and informed public participation.

Because the Project utilizes federal funding, it must follow the Federal Highway Administration’s (FHWA) NEPA process, which includes application of the Council on Environmental Quality (CEQ) NEPA regulations. See 23 C.F.R. § 771.109; *N. Idaho Cmty. Action Network v. U.S. Dep’t of Transp.*, 545 F.3d 1147, 1153 (9th Cir. 2008).

NEPA requires agencies to prepare an Environmental Impact Statement (EIS) for all “major federal actions significantly affecting the quality of the human environment.” 42 U.S.C. § 4332(2)(C). “Environmental information [must be made] available to public officials and citizens before decisions are made and before actions are taken.” 40 C.F.R. § 1500.1(b) (emphasis added). Among other things, an EIS must consider a reasonable range of alternative actions and assess site specific and cumulative impacts.<<Footnote 1>> 42 U.S.C. § 4332(2)(C)(iii); 40 C.F.R. §§ 1502.14, 1502.16, 1508.25.

CEQ regulations list factors to consider when evaluating whether an EIS is required, which include: “[t]he degree to which the proposed action affects public health or safety”; “[u]nique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas”; “[t]he degree to which the effects on the quality of the human environment are likely to be highly controversial”; “[t]he degree to which the possible effects on the human environment are uncertain or involve unique or unknown risks”; “[t]he degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration”; “[w]hether the action is related to other actions with individually significant impacts”; and “[w]hether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.” 40 C.F.R. § 1508.27(b).

The EA and Project Record disclose that the Project may have a significant impact on the environment, requiring the preparation of a full EIS. As currently laid out, the Project likely has serious environmental justice, water quality and noise impacts, as well as impacts on fish, California sea lions, and adjoining property and business owners.

ODOT improperly downplayed and minimized these impacts in the EA. Previously, ODOT has indicated that its decision to conduct only an EA instead of the more rigorous EIS was because the negative Project effects could be mitigated. ODOT claims that an EIS is only necessary when negative impacts cannot be reduced or avoided. However, many Project impacts remain uncertain and insufficiently defined based on ODOT’s inadequate EA and the effectiveness of proposed mitigation measures does not appear to be supported by any objective data, as described throughout this Comment Letter.

Through an EIS, ODOT can better involve the public, develop a wider range of alternatives, better analyze the Project’s impacts, and better avoid and mitigate for significant adverse impacts.



B. Insufficient analysis of impacts to local businesses and property owners.

The Build Alternative contemplates the need for certain right of ways (ROWs) which would have significant short-term and long-term impacts on local residents, businesses and property owners. The EA's analysis of these impacts is vague and legally inadequate. For example, it states that short-term impacts would include diversion of traffic and restricted access to local businesses." EA at 56. However, there is no identification of the routes or local businesses that will be affected or the length of time of the impacts.

In addition, there is no discussion in the EA about the costs to ODOT (ultimately the taxpayer) for condemnation of the ROWs. PacWest expects to be adequately and fairly compensated for the take of its property and the public should be given the opportunity to weigh the true costs of the Project. In addition, the potential economic and social costs of uncertainty about the future of this area to community residents, local business and property owners are not adequately addressed in the EA.

As far as long-term impacts, the Project would "displace and relocate four commercial retail or service-related businesses, three landlord-only businesses, four outdoor advertising signs, and eight personal-only properties." EA at 56-57. The exact businesses are not named, but the EA provides that "[b]usiness relocations based on the conceptual layout would include a day care center, gas station/convenience store, paint store, and a real estate/mortgage office." EA at 57.

Apparently, these impacts are not "significant" because the displaced "businesses are not 'sole source' type businesses or unique to the surrounding community" and ODOT would provide a relocation assistance program. Id. Identification of the affected businesses, and the specific impacts to those businesses and the surrounding community that rely on and work at those businesses is necessary to comply with NEPA. Further explanation and plans regarding relocation of the displaced businesses is also needed. The EA simply does not provide sufficient information and analysis of the Project ROW impacts for the public to be fully apprised of the impacts let alone submit meaningful comments.

In addition to inadequacy under NEPA regulations, the EA fails to adequately describe the relocation impacts in accordance with FHWA guidance documents, including but not limited to section G4. of FHWA Technical Advisory T 6640.8A October 30, 1987 Guidance for Preparing and Processing Environmental and Section 4(f) Documents found at https://www.environment.fhwa.dot.gov/legislation/nepa/guidance_preparing_env_documents.aspx#eadist last visited April 1, 2019.

C. Insufficient analysis and explanation of Project impacts on congestion.

Although the Project would result in "more volume through the area," the EA claims that it would ultimately result in quicker travel times by 2045 in most cases. However, there is no analysis of the Project impacts on congestion and commute times prior to 2045. This is a significant gap that must be addressed prior to a final decision. Moreover, the EA lists seven intersections that will experience increased delays as a result of the Build Alternative due to increased traffic volumes. The EA does not explain what these delays would entail or the potential impacts of the



delays on the affected community, including the impacts on businesses, like PacWest’s gas station and convenience store, their employees and their customers. Rather than analyze the impacts of these delays, the EA summarily states that the “intersections would continue to operate at acceptable levels of service.” EA at 20; see also EA at 74-75. The EA provides no data on which this conclusion is based.

D. Insufficient analysis and mitigation of Project environmental justice impacts.

As the EA recognizes the Project is likely to disproportionately affect Black and low income residents. See EA at 36-38. The EA explains that potential short-term Project impacts to these residents include:

temporary exposure to noise, exhaust, and dust emissions from various types of construction equipment, including the release of hazardous materials from spills and leaks from construction equipment or exposure to existing contamination that was not previously exposed equipment or exposure to existing contamination that was previously not exposed; temporary disruptions in transit service, including changes to normal bus routes and schedules; temporary closures of key walking and biking routes; and potential short-term interruptions in utility service.

EA at 38.

The EA then summarily concludes that these “impacts to minority or low-income populations would be avoided or mitigated” by various mitigation measures like requiring contractors to follow ODOT standard construction specifications that limit vehicle idle times. EA at 39.

However, the EA does not explain what data this conclusion is based on or why objective data cannot be provided to support this conclusion. Instead, the EA focuses on the potential long-term Project benefits like improved access to transit and improved safety for pedestrians, bicyclists and transit riders. EA at 39. However, the EA fails to recognize that these long-term benefits largely extend to all commuters, while the negative short-term impacts are born disproportionately by the surrounding minority or low-income populations.

The EA also fails to analyze the businesses and personal property owners being forced to relocate in the context of the environmental justice analysis. There is no analysis of whether the affected businesses have minority or low-income employees or customers who will be impacted by the proposed business relocations. For example, PacWest’s gas station and convenience store is relied on by many in the local community for both convenient access to gas and everyday necessities. If people in the community are having to drive farther to get gas, this could have potential environmental and socioeconomic effects that should be considered. Presumably, the day care center that will also be affected is one that is relied upon by those in the community for accessible childcare. These potential impacts should be analyzed in the EA.

The Eliot and Albina neighborhoods have suffered some of the most significant impacts from freeway and urban renewal projects in the past, from poor health outcomes from environmental hazards to gentrification and dislocation. City and state agencies are required to apply an equity lens to project planning. The historical legacy of damage to these communities demands that



the Project receive a higher level of scrutiny to ensure the negative consequences of past projects are not repeated. Accordingly, the analysis in the EA as to short-term and long-term impacts and the proposed mitigation measures is legally insufficient.

Given the short shrift assigned to environmental justice and potential discriminatory impacts on protected classes, the Project may be in violation of the Title VI of the Civil Rights Act of 1964 and related Supreme Court of the United States case law. See U.S. Federal Transit Administration, Title VI Requirements and Guidelines for Federal Transit Administration Recipients (U.S. Department of Transportation, 2012), available at https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

E. Insufficient analysis and explanation of Project socioeconomic impacts.

The EA provides vague and insufficient information regarding the Project's short-term and long-term socioeconomic impacts. The EA states that the Project's short-term impacts would include construction-related delays on I-5 and the local street network, detours and diversion of traffic, limitations on access, noise, and utility relocations" and that these impacts could "temporarily

affect neighborhoods, businesses, schools, emergency responders, and utility and public service providers located or operating in the API." EA at 65. The EA similarly provides a cursory summary of long-term socioeconomic impacts. For example, in regard to the displacement of four businesses, the EA states that "the impact would be extremely small, affecting only 0.2 percent of the assessed value of the taxable commercial property within the API, and would not represent a substantial long-term change in overall property tax revenues" generated in the area.

PacWest's gas station and convenience store and the employees who work there would presumably be affected both in the short-term and the long-term from the Project. However, PacWest is simply unable to determine the scope of such impacts from the current discussion in the EA. More information and analysis on these short-term and long-term socioeconomic impacts is needed to provide the public with an adequate opportunity to understand and comment on the Project's socioeconomic impacts.

F. The EA does not analyze a reasonable range of alternatives.

By only considering a Build and a No Build Alternative, ODOT has failed to consider a reasonable range of alternatives. Alternative courses of action were not adequately considered as required by 23 C.F.R. section 771.105(c) and CEQ NEPA regulations, specifically 40 C.F.R. 1502.14. The alternatives section is considered the heart of the document and there is only one alternative addressed. Relatedly, the EA failed to consider reasonable alternatives that are not within the jurisdiction of the lead agency, here ODOT. 40 C.F.R. section 1502.14(c).

ODOT failed to consider additional alternatives that would mitigate impacts to the surrounding property owners such as PacWest and other area residents, particularly given the Project's environmental justice impacts. In Section 2.4 of the EA, several other action alternatives were considered but not analyzed.



Notably, ODOT considered a TSM/TDM Operations Management alternative, which was described as building “on existing state, regional and local TSM/TDM strategies in the study area.” EA 23. There is no explanation as to why this alternative was limited to only “building” on existing strategies or what those specific strategies were. Moreover, this alternative did not include any consideration of road pricing, which has been shown to have a demonstrable impact on peak congestion. However, the TSM/TDM strategy alternative was dismissed from detailed consideration without explanation in the EA and implementing a road pricing strategy was not even considered.

Without considering these or similar alternatives, the EA fails to explore a reasonable range of alternatives for the Project.

G. Need for analysis of visual quality impacts and explanation as to why impacts to other resources were not considered.

The EA does not include any assessment of the Project’s visual impacts. Visual impacts caused by a highway project are seen both by people traveling on the road and by neighbors adjacent to it. The public nature and visual importance of our highways necessitates that visual impacts—beneficial as well as adverse—be adequately assessed and considered when a highway project is developed. Moreover, community acceptance of a proposed transportation project is frequently influenced by the extent of its visual impacts.

An EIS for the Project should assess the Project’s visual impacts, determine the effectiveness of mitigation measures for such impacts, and incorporate any opportunities for enhancing the visual experience of both travelers and neighbors in the design of the Project.

The EA also does not analyze or discuss the Project impacts on geology and soils, terrestrial biology, and wetlands. See EA at 25-26. The EA summarily states that these resources are either not present or the Project’s potential effects would be so minor as to not warrant a full evaluation in the EA. However, the EA fails to even explain which resources were not present versus which resources would apparently only experience minor effects from the Project. More explanation as to why these resources were not analyzed is necessary.

H. Insufficient analysis of hazardous materials impacts.

The EA indicates that there is the potential for significant hazardous materials impacts during construction if hazardous soil is encountered. See EA at 41. As a means of mitigation, the EA proposes having Phase I Environmental Site Assessments performed and Phase II Environmental Site Assessments performed where the Phase I Assessments indicate contamination. EA at 42.

However, these Assessments should be performed prior to Project approval so that the public has an opportunity to understand and comment regarding the serious environmental impacts that could occur if hazardous materials are found.

I. Insufficient analysis of noise impacts and proposed mitigation measures.



The EA indicates that there is the potential for significant noise impacts, particularly during construction. See EA at 52-54. Based on the monitoring of noise levels and their predicted future levels at multiple locations in the Project area, the EA concludes that any increases in noise levels will not be substantial. EA at 54. However, monitoring from the adjacent Harriet Tubman Middle School, which stands to experience some of the most direct noise impacts, does not appear to have been done. None of the locations where noise was monitored are as close the Project site as Tubman is, and the monitored sites appear to all be currently buffered from the Project site in various ways.

Further explanation and analysis of the Project noise impacts and proposed mitigation is needed to provide the public with an adequate opportunity to understand and comment on the Project's impacts.

J. Insufficient analysis of air quality impacts.

The EA analyzes the amount of MSAT emissions in 2017 and in 2045 under both alternatives, concluding that the Project would result in equal or lower MSAT emissions from highway operations for the Build Alternative in 2045. Despite the predicted increase in the volume of traffic, the EA explains that the expected MSAT emissions for 2045 would result from decreases in congestion and increased traffic speed. EA at 27. However, there does not appear to have been any analysis regarding the likely MSAT emissions for the period prior to 2045. See EA at 26-27; 74-75. A full analysis and comparison of the MSAT emissions from the time of construction through 2045 is necessary, particularly given the Project's proximity to the Harriet Tubman Middle School. It would not be acceptable, for example, for MSAT emissions to increase above the level estimated for the No Build Alternative for the area over next 20 years before ultimately leveling off in 2045.

Additionally, further data and analysis is needed regarding the Project's short-term air quality impacts. Short-term Project impacts from construction include the release of small particulate emissions, increased exhaust from construction vehicles, and increases in emissions related to any construction delays. EA at 26-27. The EA summarily concludes that these short-term impacts can be mitigated by various mitigation measures. However, the EA does not explain what data this conclusion is based on or why objective data cannot be provided to support this conclusion. EA at 27-28.

K. Insufficient cumulative impacts analysis.

The cumulative impacts analysis in the EA is inadequate because it lacks quantitative data and specifics about impacts of other reasonably foreseeable future actions in the Project vicinity.

The EA does not identify any specific reasonably foreseeable projects. Rather, the EA asserts that because the analysis of the Build and No Build Alternatives considers land use outcomes described in the Adopted Central City 2035 Plan, the City has already considered cumulative impacts and the EA apparently does not need to specifically address such impacts. Similarly, the EA claims that because the analysis of the Build Alternative was based on the Metro's regional travel demand model, which is built on population growth forecasts and the city's



financially constrained project list, the analysis of the Build Alternative impacts on transportation also inherently incorporates an analysis of reasonably foreseeable future actions. EA at 84. This does not meet ODOT's obligations under NEPA to analyze the cumulative effects of reasonably foreseeable future actions. See 23 C.F.R. § 771.111 (Actions evaluated under both an EA and

EIS must “[n]ot restrict consideration of alternatives for other reasonably foreseeable transportation improvements.”). Nor does it give sufficient information for the public to understand the Project's cumulative impacts and provide meaningful comments.

The EA also fails to properly assess past projects in the vicinity and the cumulative impacts of those projects. Notably, this section of I-5 has never had a full EIS conducted. Modern federal environmental review is a response to a past replete with projects that were not studied in advance and thereby caused substantial social, environmental, and even economic harms.

L. Insufficient Endangered Species Act analysis.

There has been no ESA section 7 consultation completed for the Build Alternative, even though listed species and their designated critical habitat are contained in the analysis area. The EA itself is internally inconsistent about effects. In one section, the EA implies work will not be conducted where there are listed species present, but further review of the EA indicates that dredging may occur in the Lower Willamette River in sediments considered to be contaminated where fish may be present. In addition, the Programmatic Agreement that should be found in Appendix C is not complete, or provided in draft form. Accordingly, there is insufficient information to evaluate potential effects and mitigation measures on listed species.

M. Insufficient analysis under the Transportation Act.

All federally funded highway projects must comply with not only federal environmental protection laws, such as NEPA, but also with historic preservation laws, Section 4(f) of the Department of Transportation Act of 1966, 49 U.S.C. § 303(c) (“Section 4(f)”).

Section 4(f) of the Transportation Act prohibits the FHWA from approving any project that requires the use of publicly owned parkland, recreation areas, or wildlife and waterfowl refuges of national, state, or local significance unless (1) there is no prudent and feasible alternative to using such land and (2) the project includes all possible planning to minimize harm to the parkland. 49 U.S.C. § 303(c). The EA analyzed four public parks under Section 4(f) and determined that the Project did not require the “use” of any of these parks within the meaning of Section 4(f). However, further analysis of the and information concerning the impacts to these parks and the related proposed mitigation measures is necessary to comply with Section 4(f).

Moreover, the EA does not consider or address the NMFS-designated critical habitat in the context of Section 4(f). Accordingly, there is insufficient information to determine whether ODOT has complied with Section 4(f) of the Transportation Act.

N. Closing Comments



FHWA policy indicates that EAs are prepared in order to determine whether to prepare an EIS. See FHWA Technical Advisory T 6640.8A October 30, 1987 Guidance for Preparing and Processing Environmental and Section 4(f) Documents found at https://www.environment.fhwa.dot.gov/legislation/nepa/guidance_preparing_env_documents.aspx#eadist last visited April 1, 2019 (“[t]he primary purpose of an EA is to help the FHWA and HA decide whether or not an EIS is needed.”). Based on the potential impacts identified in the EA, an EIS is required and further analysis must be completed before any decisions or further commitment of resources are made. It is noteworthy that the Oregon Department of Environmental Quality did not participate in the preparation of the EA, and apparently neither did the Environmental Protection Agency (EPA). Given the potential environmental effects involved with this Project, the lack of participation of the agencies is cause for concern, and a gap in the analysis.

Thank you for the opportunity to submit comments on the EA. We hope that you will consider and be responsive to our comments, and we look forward to continued dialogue as ODOT continues the planning process.

<<FOOTNOTES>>

1 EAs are required to contain these same elements. See, e.g., *N. Idaho Cmty. Action Network v. U.S. Dep't of Transp.*, 545 F.3d 1147, 1153 (9th Cir. 2008) (NEPA’s requirement that agencies “study, develop, and describe appropriate alternatives...applies whether an agency is preparing an [EIS] or an [EA].”); *Klamath–Siskiyou Wildlands v. Bureau of Land Mgmt.*, 387 F.3d 989, 993, 996 (9th Cir.2004) (holding that the conclusions in an EA must be supported by “some quantified or detailed information,” and the underlying environmental data relied upon to support the expert conclusions must be made available to the public); *Found. for North Am. Wild Sheep v. U.S. Dept. of Agr.*, 681 F.2d 1172, 1178 (9th Cir.1982) (To be adequate, an EA, like an EIS, must analyze cumulative impacts and respond to public comments concerning the project); 40 C.F.R. 1508.9.

Attachments: [2019 0401 Erica Malmén PAC WEST ATT](#)

2019 0325 Erika Searle

Comment: I oppose the rose quarter freeway expansion project! I moved to Portland because I shared its civic values of quality of life and sustainability. Thus, it deeply saddened me to learn that there are plans to widen a freeway right in the heart of the city. Building this would be shortsighted, counterproductive, and frankly, embarrassing for a state and region that have long been at the forefront of progressive transportation policy!

Attachments: N/A

2019 0327 Erin Eichenberger

Comment: As a small business owner and concerned citizen in Portland, I am having a hard time imagining how the Department of Transportation is even beginning to consider a freeway expansion when there are *so* many other needs in our transportation system and climate



change is a serious, urgent matter that demands our *immediate* attention. Construction is insanely expensive and that money could so easily be used for a project that works toward a higher quality of life for many instead of the death of our planet. This freeway project is moving us rapidly toward the death of humanity and the planet we live on. Please consider the impact of this project and the lives it will negatively effect. We are your community. We deserve better than this. Thank you for your attention and for choosing to use your powerful role within our political infrastructure to pursue integrity with all of Life.

Attachments: N/A

2019 0315 Erin Kress

Comment: I live in North Portland, and I commute to NW Portland via bike everyday. I used to drive, but climate change has me too concerned to not try to do my part. Also I hated going to the gym, but that's beside the point!

If climate change is real, and if freeway expansion projects do not decongest traffic, why are we expanding our freeways? Construction groups needs jobs, infrastructure needs to be updated, and pedestrians and children need to be safe. This can all be accomplished without pouring money into this sieve of a project.

Let's spend \$500 million on improving our bus systems so people are motivated to use them (make them arrive on time!). Let's spend it on improving our Max offerings. Let's spend it on more efficient parking structure for those who do drive. Let's spend it on thinking outside the box, instead of looking backwards to a system that worked 50 years ago.

Let's be the City that Works, again!

Attachments: N/A

2019 0326 Erin Lauer

Comment: As a North Portland resident, Architect, and Sustainability Consultant, I request that the freeway expansion project does not happen. Freeway expansion does not solve the problem, per ODOT employee's documentation. I also am an avid cyclist, cycling to and from downtown each day from University Park and sometimes from N Williams. This congestion will lead to increased temperatures in the urban core via the heat island effect and add to more smog and unclean air for those of us commuting by bicycle and walking, even to and from bus stops. I suggest an investment in safer bicycle and pedestrian pathways, green corridors for human parks and wildlife habitat, and bus-only lanes at least during peak transportation times. An investment can also be made to businesses that offer flexible hours or incentives for employees for not commuting during peak times. I am also deeply concerned for the students at Harriet Tubman Middle School and those at Legacy Emmanuel Hospital, where clean air is a key element of play and healing. Please take care of our state's citizens by improving health and longevity rather than expanding freeways to cause more health and environmental problems.



Attachments: N/A

2019 0329 Erin Marshall

Comment: I have lived in Portland my entire life. And it seems to me that dear PDX is experiencing some difficult and awkward growing pains. It seems like it as been years since Portland had leaders with vision that spanned longer than their own terms of office. That is why I feel so sad to be writing about such a BAD proposal for our city...the Rose Quarter freeway expansion is an AWFUL idea. It doubles down on more congestion, more pollution, more noise, less community expansion, less livability and less hope for a vibrant, clean NE corridor.

It seems to me that ODOT has an agenda that is not transparent and VERY EXPENSIVE . They way they seem to be pushing this project forward without sharing information about the environmental impact that a project of this magnitude is suspect and deeply troubling.

I suspect that would NOT be happening if the neighborhood was filled with wealthy WHITE residents! I am disheartened by the undertones of corporate bullying and the shortcuts that are being taken... Smacks of the Columbia crossing debacle! Years of wrangling, tens of millions of taxpayer money thrown away and NOBODY ASKING WHAT THE RESIDENTS of the community wanted! Shame on ODOT and whoever the muckity mucks are that are running the process!

Attachments: N/A

2019 0305 Erin Winn

Comment: This freeway expansion plan is anti-environment and ignores the progress on the horizon with ride-sharing and automated cars that can reduce congestion. It is just one more construction project that is ignoring Oregonians values of environmentalism and social justice. The City of Portland needs to take a stand to preserve the roots and beauty of our city, rather than inviting more pollution and construction.

Attachments: N/A

2019 0401 Erin Zimman

Comment: Yes, I think you will have an easier time of it, by pursuing the bike/ped improvements FIRST. I have many high energy discussions with the anti-car contingent who would not take the I-5 improvements at all, even given the much-needed bike/ped improvements. Lead with a carrot.

Attachments: N/A

2019 0401 Erinne Goodell

Comment: I am writing to express that I do not approve of the project as is, and I request a full EIS on the project to be completed.



As many groups have pointed out, projects that expand lane capacity do not successfully alleviate congestion, as more people will just feel entitled to drive, filling the meager addition of lanes. Paul Rippey has a lovely song that I'm sure you've heard that explains it simply. Not only that, but the data used to justify the project's benefits to traffic assumes there is a new I-5 bridge, which as we know, does not currently exist and it is uncertain when we will have a replacement.

Speaking of bridges, as a bicyclist I disapprove of the fact that the Flint Street bridge will be removed. We need to do projects that ENCOURAGE bicycling, not make it less convenient.

Portland and Oregon are concerned about climate change, but we are investing in projects that encourage driving and make congestion worse (see induced demand above). Not only that--one of the most egregious aspects of this project is that it will build freeway lanes (which at peak times will become like an idling parking lot) directly next to Harriet Tubman, in the historically black neighborhood that was already ripped apart by I-5 decades ago. This will affect the health of all the kids who attend this school, many of whom are kids of color and low income. Kids deserve a school play area with clean air, and I am not convinced that the project's mitigation efforts are sufficient. We need to be doing everything we can to support healthy schools where kids can play outside.

The covered areas of the project leave A LOT to be desired. Without the ability to build on the caps, the areas will just attract garbage and campers (nothing against folks living unhoused--where else are they supposed to go?), just adding to ODOT's expanse of land that is not adequately maintained. This doesn't support the Albina Vision project--which again, I-5 is one of the original projects that ripped this historically black neighborhood apart.

Instead of this mega-project that WILL NOT HAVE THE INTENDED EFFECT on decreasing traffic, we need to implement congestion pricing. While it has some regressive aspects for low income people, we MUST make changes that discourage driving, and make investments in a robust transit system that serves all people.

The I-5 project section, while it has had many fender benders, has had no traffic fatalities in decades, while other areas of the city are far more dangerous. This \$500 million could go towards better projects, like projects that fix up local highways like 82nd and Powell so that they can be turned over to local control, and/or projects that make it safer to bike, walk, and more convenient to take transit.

Thank you for taking my comments into consideration.

Attachments: N/A

2019 0401 Erwin Bergman

Comment: A major freeway expansion through a vulnerable neighborhood, including a school, is wrong.



If a project has been identified as having significant impact of major concern to affected surrounding neighborhoods, the project as proposed would significantly reduce the quality of life.

NEPA requires the preparation of an EIS, if EA cannot provide a finding of no significance (FONSI)!

Attachments: N/A

2019 0325 Esme Miller

Comment: I am writing in strong opposition to your proposed I-5 Rose Quarter project. I am astonished to see a state agency continuing to pedal pseudoscientific claims that increasing capacity for long-distance auto commutes would somehow reduce carbon emissions. If the goal here were really to reduce congestion and emissions, while ensuring capacity for essential trips, then we would be looking at an environmental assessment that considered congestion pricing along with or in lieu of new infrastructure. We would also see ODOT coordinating with other agencies and the legislature to promote massive construction of close-in housing in Portland and other urban areas, to reduce the need for long-distance auto commutes.

As someone who does a daily bike commute along the stretch of Barbur Blvd. that your agency fought so hard to keep in its current terrifying configuration, I can only shake my head at the claim that this freeway project will somehow improve safety. The deadliest roads in the city are 82nd, Powell, Barbur, etc. - your "orphaned highways." An agency that was interested in saving lives and preventing injury would be advocating for the legislature to fund jurisdictional transfer rather than freeway expansion.

I have a 13 year old. She is going to be living through the climate crisis we are creating right now. A state agency with any sense of diligence or duty to future generations would be exploring and leading our transition to low- and no-carbon forms of urban mobility, not promoting high-speed auto travel and exurban growth. Someday, Oregon will have a state transportation agency that values safety over motor vehicle speed, that respects science, that looks at cities as something other than an obstacle to traverse as quickly as possible. May Governor Brown find the courage to appoint a new director who can bring about that change.

Attachments: N/A

2019 0326 Ethan Hasenstein

Comment: Thank you for the opportunity to comment on the EA for the I-5 Rose Quarter Improvement Project. I submit these comments on my own behalf, and the views expressed are my own.

I live in Corvallis. I am employed in the construction and construction materials industry. I frequently travel to, through, and from the Portland metro area for business, entertainment, and family reasons. While in Portland, I travel by personal automobile, mass transit, foot, rideshare services, and, occasionally, bicycle. I am a strong supporter of multimodal transportation



strategies that reduce congestion, reduce carbon and storm water impacts, increase safety, and promote a livable community.

I strongly support selection of the Build Alternative. Improvements in the Rose Quarter have long been the lynchpin in the success of any regional transportation project, particularly the long-deferred effort at replacement of the aging, functionally-obsolete Columbia River crossing bridges. The 2017 legislature made a firm commitment to addressing this critical bottleneck for regional travel and West Coast commerce when it passed HB 2017. My livelihood and that of so many across the Northwest, from Medford to Morrow, depend on access to regional and global markets and the safe and efficient movement of goods into, through, and out of Portland. Coupled with other highway improvements to I-205 and other regional arteries, as well as variable pricing and tolling strategies, I believe the Rose Quarter project is essential to modernizing our state and regional transportation system.

Finally, Portland is a rapidly-growing hub that continues to drive an export-dependent state and regional economy. Continued prosperity and livability depend on infrastructure and a built environment that keep pace with this growth. Moreover, ODOT is not free to divert the funding authorized for this project and somehow repurpose it for pedestrian, bicycle, and transit projects. ODOT must live up to the commitment made by the Oregon legislature in HB 2017. In short, completing the build alternative is a keystone in a multimodal regional transportation plan that serves all of Oregon.

Attachments: N/A

2019 0312 Ethan Seltzer

Comment: I am writing to encourage you to move immediately from the EA to a full and formal EIS process to support the decision making associated with this project. The EA only considers the "No Build" alternative and the "Build" alternative that emerged from the 2011 alternatives process. All other alternatives were excluded from the EA analysis based solely on the conclusion that the work done in 2011 was sufficient.

However, much has changed in the intervening 8 years since 2011. First, nothing done in 2011 considered limiting carbon emissions as a major City and State goal. Since 2011, both the City and State have adopted new carbon emissions goals and plans for limiting future emissions. In 2019, the Oregon Global Warming Commission reported to the legislature that transportation was likely the major reason why Oregon would be unlikely to meet its carbon emission reduction targets. Further, the EA found that there is essentially no difference in carbon emission reduction between the No Build and the Build alternatives, meaning that any carbon emissions reduction will occur because of improvements in vehicles and fuels, not the City and State investment in transportation infrastructure.



Consequently, nothing that is being proposed, and none of the analysis of alternatives leading to or in the EA has actively sought a Build alternative specifically attuned to the stated carbon and climate goals of the City and the State. This is a major omission and speaks directly to the need for an EIS for this project able to incorporate alternatives designed to reduce, not accommodate, carbon emissions stemming from transportation.

Second, none of the alternatives considered in 2011 or considered in the EA incorporate the now stated expectation of the State that Oregon will pursue congestion pricing, particularly on its highway system. Even as this EA proceeds, ODOT is in the midst of a very slow process for considering congestion pricing projects specifically on this stretch of highway. Given the expected and intended impact of congestion pricing on VMT in the project area, it is irresponsible for ODOT to proceed with this project absent a careful and thorough incorporation of congestion pricing in the alternatives to adding new capacity in the project area. Again, the lack of consideration of congestion pricing is another reason why the EA was the wrong choice, and an EIS is the only reasonable process for informing the decisions to be made.

Third, since 2011 the Regional Transportation Plan has changed, most recently in 2018. The EA and the alternatives analysis conducted in 2011 upon which its based, has assumed that the projects in the RTP get built, including projects, like the Columbia River Crossing, that are no longer being actively pursued. The high degree of variability in the build-out of the RTP itself suggests that any alternatives analysis that takes the RTP project list as a given, a fixed variable, is by its very nature, both incomplete and incorrect. To simply proceed with a 2011 build alternative and to not incorporate new alternatives that dont depend on the full suite of RTP improvements, a far more likely outcome than the assumptions employed by the project to date, is both imprudent and, frankly, delusional. Once again, this calls out for an EIS, not an EA, to ensure that any decision associated with this project be made fully cognizant of the relevant and likely alternatives.

For these reasons, for ANY of these reasons, the EA is fundamentally insufficient as a means for fully understanding the impacts of this project on the transportation system, the community, the City, and the State. Simply put, the EA is far too limited in its scope to serve as the decision tool envisioned both by NEPA and by relevant community, City, and State policies, goals, and aspirations. Only an EIS can consider the ways in which changes in our community and the world have made the 2011 consideration, and elimination, of alternatives in adequate. Only an EIS can adequately update earlier analysis in light of new information and updated goals and policy. Proceeding solely on the basis of an EA makes a mockery of the expectation that project impacts be carefully and fully considered before proceeding. Its essential for ODOT to proceed directly into an EIS process prior to concluding, based on incomplete, outdated, and willfully limited information that the project benefits outweigh its costs and impacts.



Thank you for the opportunity to comment. Please contact me should you have further questions about what I've written.

Attachments: N/A

2019 0313 Ethan Wright

Comment: I am a 6 year resident of Portland and a small business owner. Portland is in a unique position to be a leader in stopping climate change and we tout ourselves as such internationally. Now is the moment to invest in infrastructure that *decreases* our carbon emissions, not *increases* them! We are on a collision course with climate chaos. If we do not take BOLD action to change the way we meet our basic needs, we are facing the end of human life on earth and we're already taking many other species out with us. What an exciting opportunity this could be to re-imagine our city as a public transportation paradise! Building and expanding freeways is the WRONG direction for Portland and for life on earth. Please kill this project and put our tax dollars toward transportation solutions that rely on human power, wind power, solar power and other creative solutions to the dire situation we are currently in. Thank you for your work in service of this city. May you consider the well being of our children's children and the thriving of all life when you make decisions on our behalf.

Attachments: N/A

2019 0330 Eugene Fifield

Comment: I have been following the arguments pointing out the flaw in the proposal to expand I5. I agree with all the points made by No More Freeways PDX. In particular projecting need based upon modeling of traffic flowing to/from a massive CRC that isn't probably ever to be built is a deception that is unfairly warping the need. We need to solve this short term with congestion pricing. Please study this as an alternative.

Outside of all the arguments we really need to start considering modeling our transportation and goods distribution based on future technology; not on a model invented by Hitler for use in blitzkrieg. Freeways in America were driven by the need to move missiles around the US for defense. We just piggybacked on that idea and let it drive our urban growth AND decay. In the near future we will have perfected autonomous vehicles and modeling based on 60 year old solutions need to be scrapped. Car ownership will plummet, transit solutions will warp into summoning a ride, connecting to a higher speed fixed rail or higher speed Express bus. Capacity of existing roadways will increase as vehicle to vehicle communications reduce accidents and eliminate traffic snakes. Cars will not need 7 car lengths between each other, they will line up coupled electronically into long trains. Let us stop inviting more pollution into our schools and homes and accelerate our transition off of the old way of building our city into a modern people friendly environment.

Attachments: N/A



2019 0319 Eugenia Tam

Comment: Hi,

As a resident of North Portland with a daily car commute that uses I-5, I am firmly OPPOSED to the highway expansion project. Residents in the North Portland neighborhoods are already concerned about the air quality, being as we are close to industrial zones, trains, and ships. There are families who have to move or take drastic measures to protect their children. Expanding the highway will only invite more vehicle usage and further degrade air quality. Congestion should be solved by other means, by improving alternative modes of transportation and by congestion pricing.

Furthermore we are at a turning point in climate change action, with the state legislature on track to pass HB 2020, and strong national consensus that we need to take action (e.g. Green New Deal). In the face of that, this project is exactly the wrong thing to do, and is a negligent use of the public money.

I hope you will change course and not invest a huge amount of resources in a project that is misguided and has strong opposition from the community.

Thank you.

-Eugenia Tam

Attachments: N/A

2019 0326 Eva Frazier

Comment: Dear ODOT and associates--

As a small business owner and car owner I know the value of moving people and commerce through cities. I am well aware of the slowing that occurs at the intersections of I-5 and I-84 in Portland. I've driven this road many times over. Because of the rush hour traffic that occurs, I make specific decisions to choose alternative means of transportation such as TriMet or bicycling. If there's one thing I'm aware of from this experience, it's that free flowing roads make people more willing to drive. Something we call induced demand. It happens with an open bar and it happens with wider freeways. With the many people that cannot and do not choose to use alternative means of transit, I strongly suggest that decongestion tolling and special lanes for HOV or commercial traffic could help move people and products through Portland more smoothly. If we continue to think that increasing road area is the answer to the future, then we are certainly not looking forward.

An ideal future has fewer freeways, more Rapid Transit, fewer traffic deaths, more bicycle infrastructure and more humane speeds on our roads. An ideal future makes not driving a car the easiest way to get around. An ideal future has freeways that are made for through traffic and commerce.

Please consider redirecting these funds to local projects that would save lives such as improving Powell, 82nd and Columbia Blvd.



Attachments: N/A

2019 0402 Evan Carmi

Comment: Hello,

I oppose the I5 Rose Quarter Freeway Expansion. Research has shown this doesn't improve congestion. Rather, we should work towards improving sustainable and environmental transport options.

Sincerely,

Evan

Attachments: N/A

2019 0401 Evan Heidtmann

Comment: Hi there,

I'm writing to express my disappointment with the i-5 widening project in the EA! Please use a full EIS to consider alternatives before moving forward with this ill-conceived plan.

Evan

Portland resident for 32 years

Attachments: N/A

2019 0312 Evan Landman

Comment: This email serves as my submission for the I5 Rose Quarter Improvement Project Environmental Assessment public review and comment period. My comments are below:

Im writing to share my opinion that ODOTs I5 Rose Quarter project is unneeded, poorly conceived, and actively hostile to the critical mobility and climate goals our city and state are pursuing. Freeway expansion projects in dense urban settings are no longer an appropriate type of project for agencies like ODOT to pursue, because every dollar that is spent here is a dollar that cannot be invested in ways that produce cleaner, safer and more equitable transportation outcomes.

Various advocates and media outlets have done a better job than I possibly could of identifying the various technical shortcomings of the work supporting this project, from the inconsistency of planning maps and technical drawings in the EA to the lack of transparency around traffic modeling. As a transportation planner myself, it is pathetic to see a large agency attempt to justify a project of such consequence with such a lack of methodological rigor and transparency.

ODOT is in a position to play a critical role in the future of transportation in this region. From the exciting potential of congestion pricing to actually manage demand on the regions freeways, to the outdated and dangerous urban state highways like US-26/Powell and OR213/82nd Ave,



there is a lot ODOT could be doing to help the cities of this region produce the transportation network they need to shift travel away from private cars and onto transit, bikes, and walking, and to make improvements that would help address the serious mobility disparities faced by low-income people and people of color in this region. Unfortunately, your freeway widening project addresses none of those needs, and actively contributes to the worsening of these conditions.

I see no compelling need for this project. I have heard no compelling rationale for why it should exist at all, when we have an unexplored capacity to manage demand on the highway network on the horizon thanks to value pricing. I see a long list of more important needs on ODOT facilities in this region. This project is a waste of \$500 million, and will go down in history as another of your agency's failures to do right by the people of this city and state. I strongly oppose this project.

Thank you for the opportunity to share my thoughts on this important project.

Evan Landman

Attachments: N/A

2019 0402 Evan Ramsey

Comment: As a Portland resident I am extremely opposed to new spending on freeway expansion. At this point in human history, any money not spend on more sustainable transportation is a negative. There are many other beneficial uses of these funds that would reduce traffic and emissions such as bike infrastructure or clean public transport. Please reconsider this project. Thank you.

Attachments: N/A

2019 0401 Evan Reeves

Comment: In general I am strongly opposed to the project that ODOT is working on. I do not believe that a \$450M investment in freeway expansion is an appropriate way to spend taxpayer funds. Specifically related to this environmental impact assessment, I do not believe that ODOT has been forthcoming with the data they they used to arrive in their conclusion. Numerous public advocacy groups have asked for ODOT to make that information available, which has not been done. I also do not believe that this environmental assessment is scoped properly - I do not think that it placed enough emphasis on the impact to the immediate neighborhoods that would be affected, nor does it speak properly to the long-term effects that a freeway expansion will have in regards to the overall impact on transportation in the greater Portland metro area. The two primary concerns of this project, as I understand it as a citizen are to a) decrease the traffic bottlenecks in the I5 Rose Quarter area and b) address safety concerns about merging traffic in that area. If ODOT is looking to spend money to improve safety - there are plenty of other areas in the city where this money will be better spent. Portland's Vision Zero initiative has a long way to go towards improving safety in areas OTHER than the I5 corridor. How many people have been hit and killed on Division this year alone? How



many have been hit and killed on this part of the freeway? Second - this investment makes no sense as a long term investment in our city's future. If we are to continue leading the way in the PNW in regards to sustainability and transportation plurality - this is not the way to be spending the money. How much sidewalk could that money buy? How many safe crossings could it build? How many bus-only lane projects would this fund? How many safely protected bicycle routes could this fund? I do not want to reside in a city that prioritizes large investments into freeway infrastructure when this is clearly a pattern that has no positive outcome. What attracted me to Portland ten years ago was the ability to live a car free lifestyle. If you want to continue to attract talented, smart, creative individuals that build thriving communities and culture do not invest \$450M in a freeway - help make our city vibrant and green!

Attachments: N/A

2019 0305 Evan Siroky

Comment: NO. MORE. FREEWAY. EXPANSIONS. Please spend the money on something else significantly more beneficial like bicycling infrastructure, better transit, transportation demand management programs or building affordable housing next to job centers. And honestly, this freeway shouldn't even exist where it is in the first place. Freeways do not belong in the middle of city centers.

Attachments: N/A

2019 0326 Evan Ward

Comment: I'm writing today to oppose the I5 Rose Quarter expansion project. From safety to congestion, the benefits are minimal, and from pollution to induced demand, the costs are substantial. ODOT is asking public to spend a huge amount of money without a huge benefit, when half that money could achieve larger benefits in multiple other locations.

Urban freeways are fundamentally about moving people from the suburbs into the city and out again as quickly as possible, and as such shift costs to the people who live in the city. Living near Foster Road, I'm familiar with people who think this is a good thing: business owners who oppose the road diet currently in progress say that traffic will be delayed, but those affected by the delay don't live nearby, and those currently affected by the high traffic volume and pollution and safety risk do, and it sounds crazy to prioritize the convenience of people far away over the quality of life for residents.

But this is exactly what ODOT is asking of Rose Quarter residents, especially Harriet Tubman Middle School students: bear the burden of increased pollution, noise, and traffic on arterial streets to save a minute or two for each person driving in from our out to Vancouver. There are circumstances in which it's appropriate to ask one group to sacrifice for another, but poor and minority middle school students shouldn't be sacrificing their health.

Last year I lived off MLK and Alberta, and several times I rode my bike down and across the Broadway Bridge for Thorns games, and I found the access and convenience to be great. This project would remove the Flint Street bridge, and replace it with one running the other direction



with a very significant incline. I'm pretty fit, but we need to preserve the accessibility we have for everyone to bike around the area.

All this is to say nothing of how congestion would only improve for a couple years if at all, or how there's no way to be confident traffic volumes overall will continue to grow, or how the collisions to be prevented are overwhelmingly minor ones. ODOT is asking for an extraordinary amount of money, and they haven't met even a routine level of scrutiny for this project. There are better ways to spend the money, but if we won't get the money if we don't do this specific project, then we'd still be better off without the associated construction inconvenience.

Thank you,

Evan Ward

7601 SE Tolman St

Portland OR 97206

Attachments: N/A

2019 0331 Evan Watson

Comment: I am against freeway expansion in Portland because it's a step backwards on reducing our city's carbon emissions, will dis-proportionally benefit people of wealth, and will do little if anything to solve congestion. This last weekend my car broke down while my girlfriend and I were visiting some friends in Seattle for a couple days. I couldn't afford the bill, so I signed up for a credit card to cover it. We still had a great time, and were still able to get around the city by riding the bus, ride sharing, and walking. I'm probably going to sell the car because it will likely have more issues down the road. I want to live in a city where reliable transit can get me around and I never have to worry about another financially debilitating bill from an auto shop ever again.

Attachments: N/A

2019 0311 Evelyn Cole

Comment: I am very against the Rose Quarter freeway expansion! Bigger freeways mean even more cars and trucks on it with their carbon dioxide fumes. Portland must work on reducing any fumes that add to Global Warming. It will take part of Tibman's yard as well, our children need a good school. And it will be VERY expensive, using funds that could help in so many better ways, such as housing, schools, etc.

Attachments: N/A

2019 0327 Evelyn Cole

Comment: We don't need more freeways, we need better public transportation!

Attachments: N/A