



Environmental Assessment Comments

First Name Begins with P or Q

Ordered by first name

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2019 0331 Pablo Martos

Comment: I want to see a full EIS. I want to know how ODOT thinks it can justify building more single-occupancy vehicle infrastructure when what we need is light rail. I want to know how you justify building something that will only expand single occupancy vehicle use when we haven't made the switch to renewable energy yet and thousands of Americans just died in 2017 because of a climate change-intensified hurricane in Puerto Rico. This will intensify air pollution and associated respiratory problems in a town already struggling with that. I am so disappointed with the push forward on this. I disagree with the freeway expansion on a fundamental level, for financial and environmental and transportation policy reasons.

I know sidewalks in East Portland, bus rapid transit lines across town, and a solid down payment towards the proposed underground light rail tunnel aren't ODOT's explicit mission, but they'd be a MUCH better use of funds than more highway capacity, and improve local conditions so much more. This freeway expansion is unnecessary and counterproductive.

Attachments: N/A

2019 0312 Paddy Tillett

Parks Board

Comment: Good evening. My name is Paddy Tillett. I'm on the Parks Board. You have heard from my colleague who covered a number of points that the board made to ODOT over this project. I want to focus on a particular one and that is the moral responsibility, one might say, of mending the damage that was done by Mr. Moses when the I-5 was built in serving the community. The job of the proposed reconstruction or one job of it is to re-knit those communities together to give access to the riverfront from the communities that are east of the freeway. What is being presented is that trace of remaining lands which is called partial freeway cover, which assumed to be a community space that Parks is presumably expected to look after. The Parks Board would have no -- actually have no compunction in advising against such a thing. It would not contribute to any particular community. It would detract from future park work on lower Albina. And above all, it does nothing to connect the communities. We need buildings across the top of the freeway, not remainder space colored green in the hopes that it will work. So I'll leave it at that. Thank you very much.

Attachments: N/A

2019 0311 Paige Goodlett

Comment: I write with grave concerns about the proposition of the Rose Quarter I-5 Expansion Project. We are in the midst of a critical point in time in addressing climate change and environmental justice and this project is not only symbolic of climate change denial, but will in fact contribute to rising emissions from cars and vehicles. We need a transportation solution that seeks to curb carbon emissions through creative means and current times beg for us to take a



deeper inquiry into public transportation options and electric vehicles. I strongly oppose this measure - it will not improve congestion, freeway expansions will increase air pollution and the allocated budget for this project should be invested in renewable energy and greener solutions for public transportation. Community opposition to this measure is strong and before this immense amount of money is spent on a freeway expansion that will harm our environment and negatively impact local communities, the ODOT should listen to the response from Portland communities.

Attachments: N/A

2019 0401 Parents of HTMS Students

Parents of Harriett Tubman Middle School Students

Comment: The undersigned parents of Harriet Tubman Middle School students wish to formally voice our opposition to the Oregon Department of Transportation's (ODOT) plans to widen the Rose Quarter Freeway into the backyard of the Harriet Tubman campus. Many Tubman community members believe this freeway widening proposal is a direct affront to the immediate health and safety of our students, a potentially destabilizing blow to the decades-long community effort to restore a thriving and diverse Middle School community at the historic Tubman campus, and an unacceptable investment in fossil-fuel infrastructure that imperils future generations to the potentially catastrophic horrors of climate change. Alternatives should be more rigorously explored that don't involve threatening the health, well-being, and safety of our students, teachers, and community, and ODOT should heed the calls of PPS Board Members and numerous other elected officials to conduct a full Environmental Impact Statement before moving forward with this proposed freeway expansion.

History and present of Harriet Tubman Middle School

The history of disinvestment and subsequent gentrification and displacement of our inner North Portland neighborhood is well documented but necessary context to frame the ongoing challenges the Tubman community is facing today.¹ The Harriet Tubman Campus (then known as Eliot Elementary) was built in 1953 before the I-5 project was constructed. Despite opposition from PPS and the local community, the construction of I-5 in the 1970s bulldozed 330 homes in Portland's historically black Albina neighborhood. Construction of this freeway, coupled with the construction of Memorial Coliseum and the Legacy Emanuel hospital, had a significant destabilizing impact on the local black community, bulldozing many homes and businesses and pushing the African American community farther North and Northeast. PPS nearly closed Tubman in 1982, but a march of over 500 community members organized by the Black United Front demanded PPS listen to the existing African-American community who wanted to retain Tubman as a middle school and keep Boise Elementary open as a nearby neighborhood school.² Low enrollment led to the building being shuttered in 2012, despite community protests. Portland Public Schools (PPS)'s efforts to address redistricting school boundaries and provide adequate middle-level education to students in our neighborhood led to the decision to reopen Harriet Tubman as a Middle School in 2018.



Harriet Tubman students and teachers have an uncompromised right to clean air. Freeway expansion inevitably leads to air pollution that directly threatens our community. Air quality researchers at Portland State University released a report in April 2018 expressing their concerns about the high levels of air pollution at Harriet Tubman Middle School. The first recommendation of the report stated that “student outdoor activities be limited at Harriet Tubman Middle School, especially during high traffic periods.”³ The report found levels of acrolein, benzene, and naphthalene higher than Oregon’s Ambient Benchmark Concentrations. Nearly 18,000 diesel-powered trucks pass by Tubman on a daily basis - as of March 2019, Oregon has by far the weakest diesel regulations on the West Coast. The report was clear: “the primary risks to future occupants of Tubman MS related to ambient air quality are due to freeway emissions.”

Willamette Week reported on this finding, and quoted PSU’s Dr. Linda George saying that “It’s very reasonable to expect concentrations would be higher and extend further into the property” if the freeway was widened into the backyard of the campus.⁴

This report is bolstered by other findings. Late last year, the Environmental Protection Agency (EPA) published their most recent iteration of the National Air Toxics Assessment, which reflected conditions in 2014. EPA ranked census tract 23.03 (the tract at Tubman) as the seventh highest of risk for cancer of any in Oregon (census tracts 22.03 and 21 are similarly high). All three rank among the top ten in the state, and this is almost certainly an underestimate - the EPA doesn’t recognize diesel particulate as a carcinogen, so it’s not fully included in the estimate.

Given these statistics about the dirty air pollution in our neighborhood, we find it insulting that ODOT’s freeway expansion proposal involves widening I-5 (and the tens of thousands of emitting automobiles and trucks) farther east and even closer to the Tubman building and students inside it. As parents of children who breathe the polluted air, we are the ones forced to live with the repercussions of these decisions. It’s our material and physical loss when we are forced to buy inhalers for our children when they are diagnosed with asthma, and it’s our children who suffer these very real health consequences. It’s our teachers and administrators who are always wondering if a headache is just an occasional migraine or a symptom of something more nefarious, due to the particulates in the air from the nearby freeway. It’s our right and responsibility to fiercely demand a rational, empirical, and thorough to ensuring this Middle School is a safe and healthy learning environment and workplace.

The overwhelming academic literature on air pollution from transportation suggests that decongestion pricing, and not freeway expansion, is the best policy to improve local air pollutants and mitigate the impacts of freeways on their surrounding communities.⁵ According to The Washington Post, childhood asthma rates in Stockholm, Sweden were reduced by nearly fifty percent after the implementation of decongestion pricing.⁶

For some reason, ODOT’s Environmental Assessment of the impacts of this project does not study the impact that decongestion pricing would have on the traffic on the I-5 corridor nor its impact on the necessity of this project. Our community is outraged that ODOT is not pursuing the easiest, most cost-effective policy to address traffic congestion that the scientific consensus



also recognizes is the most likely to improve air quality in our community. ODOT’s projections of improved air quality in the area under the no-build scenario are also based on assumptions about improvements in technology and local air quality regulations - assumptions the agency is unable to promise will happen.

Tubman parents take the existential threat of climate change seriously – does ODOT?

As parents of Harriet Tubman students, it’s our responsibility to work to help every student at Tubman succeed, both here at this institution and into the future as the next generation of Portlanders, Oregonians, and Americans. Given this perspective, as community members we feel it is important to note that this proposed freeway expansion flies directly in the face of local, state-level, and international findings about the grim necessity of decarbonization. The notion that a sixth grader entering Harriet Tubman Middle School next autumn would be wrapping up their senior year of college in 2030, the year that the Intergovernmental Panel on Climate Change (IPCC) recently stated was the deadline for a complete decarbonization to avoid the absolute worst impacts of climate change, is grounds for significant concern. Freeway expansion is climate denialism - American cities simply cannot decarbonize through electrification of existing vehicles alone.⁷ Fossil fuel infrastructure like freeway expansion has no place in our current transportation system if we are to fully meet our goals. Investments in public transportation and dense, walkable urban communities help build low-carbon communities that will help future generations avoid the worst of climate change’s excesses. Meanwhile, the Rose Quarter Freeway Expansion project actually *slows* bus speeds through the neighborhood.

Harriet Tubman is a frontline community

According to PPS’s data, just under half of Harriet Tubman’s students qualify for free and reduced price meals. Only 31.4% of Harriet Tubman students identify as white - this is the 2nd lowest percentage of a middle school campus out of the thirteen in the district. 40% of Harriet Tubman’s students identify as black - the third highest of any PPS campus across all grade levels.

[Table insertion here - see pdf for appropriate formatting]

% Non-White⁸ % Black % Underserved⁹ % on Free/Reduced Lunch¹⁰

Harriet Tubman Students

68.6 40.5 73.5 48.9%

All PPS Middle Schools

44.3 9.5 47.5 33.3%

All PPS students 43.7 8.9 49 36.0%

- 2018-2019 PPS Demographics

After years of organizing on PPS’s expedited timeline to open the school, Tubman parents from four demographically different elementary schools across inner North/Northeast Portland have spent the past two years collaboratively attempting to match PPS’s ambitious timeline for



opening by building the network of parents, teachers and students who can provide the best support for our children's education.

As parents who want this school to succeed, we are tasked with solving problems big and small - we are spending enormous amounts of our own volunteer time and resources finding answers to questions as big as "what middle-level programming will best meet the needs of a student body with wildly different needs" and as small as "how do we find enough parent volunteers to chaperone our school's first Middle School dance." We are acutely aware of the reality that building these relationships across our community is especially difficult given the grave demographic and material disparities between our four feeder elementary schools. Building a social institution that can marshal the resources of the Tubman community and the city at large to stick up for and support all 491 students enrolled at the school is a difficult task, and our community continues to grapple with questions of how to serve our students equitably.

Tubman Community needs stability and support - not construction headaches, relocation, and pollution.

This project does an enormous disservice to the North/Northeast Portland families who are putting in the elbow grease to build a thriving, integrated, restored community at Harriet Tubman Middle School. While our community's capacity to oppose this freeway expansion is relatively low, given the numerous other daunting challenges our community face, we remain steadfastly opposed to this project and ask ODOT to explore other alternatives less disruptive to our community. We're grateful for PPS's support in asking for an Environmental Impact Statement.

This freeway expansion (and the disruptive impact of years of construction leading up to it) directly threatens the work our neighborhoods have put into turning this empty school campus into a thriving, integrated community. How will these hard-won gains respond to a potential disruptive school-relocation during ODOT's construction? Will legitimate concerns about increased air pollution force neighborhood parents to reconsider sending their student to Tubman, or to more strongly consider charter/alternative/private schools? How will this school retain teachers when there's already considerable evidence that this community's air quality is a direct threat to the health and well-being of anyone who lives or works here? Has ODOT meaningfully engaged with PPS to ensure their proposal doesn't disrupt the already destabilized hillside on which Tubman rests? What assurances does the Tubman community have that ODOT won't "value-engineer" out the crucial sound walls or other remediation features of their plan when the costs of the project inevitably overrun? ODOT currently plans on routing significant bus/automobile traffic on N Flint during the proposed reconstruction of the N Williams/Vancouver bridges - two Tubman students have already been hit on N Flint while walking to school, and bringing this additional traffic to the western front of the school will make for chaotic pick-up/drop-off routines.

We find it unjust to ask current and future Tubman students to pay decades of bonding debt to pay for this project, as well as pay for the enormous costs of the additional carbon in the atmosphere and air pollutants in the neighborhood. As parents, citizens, community members, students, and Portlanders, we state our firm opposition to ODOT's Rose Quarter freeway widening proposal, and demand that if this project does move forward, the agency conduct an



Environmental Impact Statement to address the significant impacts this project would cause to the health and safety of our students and community.

Signed,

Brooke Herout, Harriet Tubman Middle School PTSA Vice President

Joan Petit, Harriet Tubman Parent

Lee Ann Moyer, Harriet Tubman Parent

Rayna Geer, Harriet Tubman Parent

Taylor Geer, Harriet Tubman Parent

Jim Herout, Harriet Tubman Parent

Sources:

1 Karen Gibson, *Bleeding Albina: A History of Community Disinvestment, 1940-2000*.

2 More on the history of the 1982 protests can be found here: *The Harriet Tubman Middle Schools Protests: Black United Front vs The Portland School Board*.

<http://publichistorypdx.org/2017/03/26/harriet-tubman-middle-school-protests-black-united-front-vs-portland-school-board/>

3 “Indoor and outdoor air quality at Harriet Tubman Middle School and the design of mitigation measures: Phase I report” was published on April 18, 2018; the document is available here:

https://s3.amazonaws.com/arc-wordpress-client-uploads/wweek/wp-content/uploads/2018/07/05143206/Tubman-PSU_HTMSReport_Phase1-Outdoor-Monitoring_Final.pdf

4 “A Middle School Prized by Portland’s Black Community Would See Its Poor Air Quality Worsen With a Rose Quarter Highway Expansion” *Willamette Week*, July 4, 2018:

<https://week.com/news/2018/07/04/a-middle-school-prized-by-portlands-black-community-would-see-its-poor-air-quality-worsen-with-a-rose-quarter-highway-expansion/>

5 University of British Columbia Professor Dr. Alex Bigazzi, in an interview regarding his article “Can traffic management strategies improve urban air quality? A review of the evidence” published in the *Journal of Transport and Health* :

“We looked at the entire body of literature, including hundreds of published papers, and identified 65 studies documenting the real-world effects of 22 types of traffic management strategies including speed enforcement programs, lane management such as HOV lanes, road and congestion pricing, and trip reduction strategies like incentives for telecommuting or ride sharing. The strategies with the best evidence of air quality improvements are area road/congestion pricing and low-emission zones. Other strategies have potential benefits, but there is less empirical evidence, either because the benefits are very small or because the benefits are offset by some other effect.”



Dr. Bigazzi's article can be read here:

<https://www.sciencedirect.com/science/article/pii/S2214140517301330>

Dr. Bigazzi's quote is from this interview on the University of British Columbia's website:

<https://news.ubc.ca/2017/10/05/road-pricing-most-effective-in-reducing-vehicle-emissions/>

6 "Congestion pricing also clears the lungs, researchers say." Washington Post . March 27, 2018.

https://www.washingtonpost.com/news/tripping/wp/2018/03/27/congestion-pricing-clears-the-lungs-too-researchers-say/?utm_term=.fe445a2efa58

7 "There is a persistent belief, among both state officials and the public, that clean cars and clean fuels alone can achieve California's climate goals, but this is fundamentally untrue," [Matthew Baker, policy director for California's the Planning and Conservation League] says. "Even if we have 100 percent zero-emission vehicles and 75 percent renewable energy production by 2050" both ambitious goals "we still need a 15 percent reduction of VMT beyond what current regional plans project to achieve." Plus EVs are not a public health panacea. "EVs don't relieve congestion, and the dust from brakes and tires are a major source of particulate matter air pollution, which causes respiratory illness," says Bryn Lindblad, associate director of Climate Resolve. "That last fact doesn't really seem to be on people's radar as they look to EVs to be the solution."

"When electric isn't good enough: Sacramento is the staging ground for a fight to make drivers spend less time on the road." Curbed . <https://www.curbed.com/a/texas-california/electric-cars-climate-change-sacramento-california>

8 Data on the % Non-White and % Black demography of PPS schools can be found here:

<https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/207/Enrollment%20by%20Race%20and%20School%202018-19.pdf>

9 According to PPS, the Combined Underserved category was originally established by the Oregon Department of Education as part of the requirements of the ESEA Waiver. PPS's current definition of Combined Underserved includes the following: Students eligible for Special Education, Students with Limited English Proficiency, Students eligible to receive free meals by Direct Certification, Students identifying as Black, Latino/Hispanic, Native American, and/or Pacific Islander. This data can be found here:

<https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/207/Enrollment%20of%20Underserved%20Groups%202018-19.pdf>

10 Data on PPS' free/reduced lunch demography is available here:

https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/207/Enrollment%20by%20Meal%20Eligibility_Free%202018-19.pdf



Attachments: [2019 0401 Parents of HTMS Students ATT](#); [2019 0401 Parents of HTMS Students ATT 2](#); [2019 0401 Parents of HTMS Students ATT 3](#); [2019 0401 Parents of HTMS Students ATT 4](#); [2019 0401 Parents of HTMS Students ATT 5](#); [2019 0401 Parents of HTMS Students ATT 6](#); [2019 0401 Parents of HTMS Students ATT 7](#); [2019 0401 Parents of HTMS Students ATT 8](#); [2019 0401 Parents of HTMS Students ATT 9](#); [2019 0401 Parents of HTMS Students ATT 10](#); [2019 0401 Parents of HTMS Students ATT 11](#)

2019 0205 Pat Frobes

Portland Parks Board

Comment: The Portland Parks Board has been following the I-5 Rose Quarter Improvement Project and would like to take this opportunity to provide some initial feedback and recommendations to the project team.

The Parks Board Land Use and Infrastructure Committee has reviewed the documents provided. Our Subcommittee focused on the "community space" shown on illustrations of ODOT's I-5 scheme for widening the freeway and rationalizing surface streets above. The illustrations were published prior to the environmental assessment which is due to be completed soon. Attention was drawn to extensions of some of the surface street connections above the freeway since they were colored green and looked like possible public park spaces. These raised several concerns, including:

- The fragmentation of the "greenspaces", with the larger pieces isolated by vehicular traffic, and thus of limited utility.
- Distance from established neighborhoods in the vicinity and lack of clarity about who the greenspaces are designed to serve.
- Possible expectations that Portland Parks & Recreation (PP&R) would be maintaining the spaces, which primarily appear to be remnant pieces difficult to successfully program and operate.
- How this large investment in public open space over the Freeway might detract from other nearby opportunities such as the proposed Albina waterfront open space development (as part of the Albina Vision).
- How the proposed Clackamas overcrossing would provide good connectivity to the waterfront.
- Why the proposed improvements are oriented to the freeway and not to the City grid.
- Whether the proposed Freeway caps provide enough community benefit to justify their expense.

Our Subcommittee has observed that the paramount urban function for the streets above the freeway is to connect neighborhoods to the waterfront with active sidewalks and street frontages.



In light of these observations and concerns, on January 3, 2019 the Portland Parks Board adopted the following recommendations, and directed that these be provided to PBOT, ODOT and the project team:

- Support project funding of a review by an urban design team of alternative capping scenarios. This would allow opportunity to rethink how to make this project more beneficial to the community.

- Extend the proposed 30-day public comment period for the project's environmental assessment, which is being prepared by ODOT. Longer comment periods are typical for any project with heightened community

interest. Ideally, the comment period should be extended to 90 days.

- Decline any requests for PP&R to manage or maintain the Freeway caps as currently designed and configured.

The Board is happy to answer any questions or clarifications that you may have.

Thank you for the opportunity to comment at this time.

Attachments: [2019 0205 Pat Frobes ATT](#)

2019 0205 Pat Frobes

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- How this large investment in public open space over the Freeway might detract from other nearby opportunities such as the proposed Albina waterfront open space development (as part of the Albina Vision).
- How the proposed Clackamas overcrossing would provide good connectivity to the waterfront.
- Why the proposed improvements are oriented to the freeway and not to the City grid. Whether the proposed Freeway caps provide enough community benefit to justify their expense.

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- Extend the proposed 30-day public comment period for the project's environmental assessment, which is being prepared by ODOT. Longer comment periods are typical for any project with heightened community interest. Ideally, the comment period should be extended to 90 days.
- Decline any requests for PP&R to manage or maintain the Freeway caps as currently designed and configured. The Board is happy to answer any questions or clarifications that you may have. Thank you for the opportunity to comment at this time.

Attachments: N/A

2019 0327 Patience Bingham

Comment: I am opposed to the Rose Quarter Freeway Expansion project. This proposed \$500 million freeway expansion in the backyard of Harriet Tubman Middle School will cause more traffic congestion, more air pollution, and more carbon emissions right by a public school that already has air pollution so bad that PSU researchers have recommended that the children there not go outside for recess.

Freeway expansion has never solved traffic congestion in any North American city. Before we build an enormously expensive freeway project, let's implement some type of decongestion pricing.

Furthermore, building a costly freeway project now is a blatant denial of the existential threat posed by climate change. Oregon must do better than this! Now is the time to spend money on public transportation and pedestrian friendly improvements, not a costly project that will add to our city's air pollution and carbon emissions.



Please more fully study alternatives (including decongestion pricing!) to this expansion with a full Environmental Impact Statement.

Thank you,

Attachments: N/A

2019 0311 Patricia A Holm

Comment: We don't need any more freeways...or roads. We have enough and let them be a little congested for awhile and maybe more folks will opt for public transportation. Listen to Tony Seba, nationwide speaker about the coming electric car revolution coming this decade. We will soon have self-driving cars and we won't have as many private vehicles. With climate change, we can longer afford the private automobile.

Attachments: N/A

2019 0328 Patricia Lee Caldwell

Comment: I am commenting on the new I5 expansion plan. I Work in Portland a lot but like to take MAX if I am able. My daughter goes to Pacific NW college of Art (PNCA) down town and parks her car in Gresham and takes MAX the rest of the way to cut down on pollution, wear and tear on roads ,save gas, and money for parking down town. That expansion would put the kids at Tubman school in a higher pollution health risk too. Also It would encourage big trucks to at last travel through Portland in the day time in stead of resting during the day and traveling through at night! Please, you need to focus on more CLEAN transportation into our beautiful city that we enjoy so much even living up here in Sandy! We say a big NO on this project!

Attachments: N/A

2019 0310 Patrick Best

Comment: Studies have shown time and time again that, "if you build it, the will come". Widening the freeway won't reduce congestion-- instead it will induce SOV trips. Please study and do a trial of congestion pricing on I-5 in Portland in order to access how much of the current congestion is needed and how much can be moved to alternate modes. This cheap-to-implement option will help inform ODOT about whether a costly freeway expansion is really warranted. In any case, freeway covers will help mitigate the effects of the freeway on the Rose Quarter and make it a more attractive place to live! Please explore more opportunities for highway covers elsewhere in in the city.

Attachments: N/A



2019 0327 Patrick Craddock

Comment: The most simple solution to the traffic epidemic, is mass free public transportation. Why not create for new train lines running parallel to the freeway? It is an illusion that more space means less Congestion. We tend to fill all empty space. Wider freeways also make for even worse bottle necking jams. More roads is a bad idea. With perfect public transportation, less roads is more. Giving us more real estate for private properties, parks, bike paths, gardens etc. I vote for trains and bus routes instead of spending millions/billions on the same/new, failing roads and highways.

Attachments: N/A

2019 0326 Patrick Halley

Comment: Hello, I very strongly agree that decongestion pricing should be implemented before expansion. Road pricing is the only policy actually proven to reduce traffic congestion; it's also proven to improve air quality and reduce carbon emissions as well. Portland has thrived on being a small town behind the curve of automobile culture. We have to consider the missteps of other cities to prevent history from repeating itself in our town.

Attachments: N/A

2019 0401 Patrick Hickey

Comment: I'm a Portland resident, and I'm strongly opposed to the Rose Quarter freeway expansion. The last thing in the world Portland needs are expanded freeways. Climate change is an urgent, existential threat to our planet, and freeways are one of the major drivers of climate change by increasing automobile dependence. It is outrageous to spend public resources on solving "traffic" by making room for more automobiles. Instead, we need to use that funding to build out more light rail, streetcars, protected bike lanes, and affordable housing. The past decade has been full of development that has pushed working class people beyond the reach of public transit, and made a pleasant commute to downtown a luxury commodity. We need to address the root causes of these problems, and adding more lanes of traffic will only induce demand and make them worse.

Attachments: N/A

2019 0304 Patrick Halley

Comment: Why is ODOT moving forward with a \$500 million boondoggle investment without first instituting congestion pricing to see if that mechanism wouldn't solve the traffic problems on the corridor? The proposed solution is archaic and I continue to urge everyone I know to voice opposition.

Attachments: N/A



2019 0401 Patrick Maloney

Comment: As a long time Portland resident and business owner, I strongly oppose the proposed expansion of I5 through the Rose Quarter. There is no evidence that the proposed expansion will reduce congestion, and even if there was the long term climate and congestion issues facing our expanding community are better met through improved rapid transit and transit oriented development. The proposed \$500 million (not including overruns and the cost of expansion that would be required in other parts of the freeway system) would be better spent on more scalable and effective transit and planning alternatives.

Sincerely,

Patrick Maloney

Attachments: N/A

2019 0401 Patrick Rafferty

Comment: Hey gang, I don't have a lot of time here (which is why I vote to elect officials to make decisions on my behalf), so I'll just say that this whole I5 thing isn't going to fix any problems, and it's going to make the problems we already have - notably CO2 emissions - even worse.

I hate that I even need to say this, I would assume that the people running the show (i.e. you) would be smarter than this, and would have shut this whole thing down to deal with more pressing concerns, but here I am. Make the right choice here, not for more cars and the trucking industry (or whoever is pulling your strings).

Attachments: N/A

2019 0217 Patrick Sullivan

Comment: For only "slightly" improved air quality and travel times the investment in freeway widening does not seem worth the cost. Capping or covering the freeway does look like something worth trying to do, along with the pedestrian and mass transit upgrades.

I did not see any mention of how safety and travel time would change if the tolling or congestion pricing currently being explored were to be implemented. If tolls reduce traffic and congestion, that would likely improve safety and negate much of the reason for freeway expansion.

These need to be studied in the context of tolling in order for the public to truly know the potential value of any investment

Attachments: N/A



2019 0324 Paul

Comment: I am a person with a disability and I have concerns about the proposed I5 expansion. I cannot drive because of my disability. Therefore, I rely upon public transportation to get to work and live in the Portland metro region.

It does not appear that the I5 rose quarter expansion considers the needs of people like myself who cannot drive. In fact, ODOT's analysis indicates increased bus travel time on certain routes through the area of expansion. How is this equitable? People who drive are getting \$500 million in infrastructure yet people like myself are getting increased bus travel times. Please consider inclusion of people of all abilities when implementing major transit projects. Without reliable public transit, people like myself would not be able to live and work in this region. How does the I5 rose quarter expansion address the transportation needs of people like myself who cannot drive?

Attachments: N/A

2019 0327 Paul Arzt

Comment: This is a mistake. If controlling congestion is the goal it seems like a much better idea to start with tolling the freeway and seeing what kind of decongestion goals it can meet. We could spend that \$500 million in many many more ways that would help prepare us for the future and help with congestion on I-5. We really should try anything to save that money before we recklessly spend it on the freeway.

Attachments: N/A

2019 0401 Paul Frazier

Comment: Hello,

I am a Portland resident voicing opposition and concern to the I5 project.

1. How is the foot print of the freeway getting wider not considered a widening project? Call it aux lanes, merging lanes, wider shoulders, whatever. IF the width that cars can drive on gets bigger its a widening project.
2. It would slow busses down. This makes ZERO sense. We know Portland has a congestion problem, how are going to solve it if this build option makes the status quo for a far more efficient transpiration method worse?
3. It does not do enough to promote alternative transportation. Sure there are some token bike lanes and sidewalks. But it slows busses down. Doesn't create bus rapid transit lanes. And some of the bike over passes contain switchback like ramps. When is the last time you saw I5 with a switch back
4. We need decongestion pricing, why not try that first? And spend this money on improving alternative transport options?



5. Flawed data. I have issues with using projections that assume a bridge that currently has zero approved funding will be built
6. Impact on Harriet Tubman school.
7. The freeway caps are not significant enough to create actual use of them. Who wants to hang out in park surrounded by a 4-8 lane freeway?
8. Renderings of rebuilt local streets are concerning, wider turn radii, confusing bike lanes, bus issue. etc.
9. Impact to east bank esplanade.
10. Opportunity cost of ODOT staff, and construction crews. Lombard, 82nd, and other ODOT owned roads have more deaths on them. We need to stop having our infrastructure kill people.

Thank you for your time,

Paul Frazier

Attachments: N/A

2019 0307 Paul Jeffery

Comment: I oppose this project for a number of reasons.

- 1) Safety: you talk about crash frequency, but the overwhelming majority of crashes in this section are low-speed fender benders. For serious injuries and deaths, it's one of the safest sections of ODOT road. Why not spend money improving real problem areas? 82nd, Powell, etc.
- 2) Air quality: your projections are laughable! No build = 799 VMT; build = 801 VMT. That's half a billion \$\$\$ for a very tiny improvement. If I spent that much for that little I'd expect to get fired.
- 3) Induced demand!
- 4) Does nothing for the neighborhood
- 5) Takes money away from transit
- 6) Those useless caps!
- 7) Bad bike and ped. infrastructure
- 8) Lost opportunity to do a real project.

Attachments: N/A



2019 0307 Paul Jeffery 2

Comment: I oppose this project. I am not convinced that any care was taken with the induced demand study. One of your stated goals—reduced congestions—undermines your claim that induced demand does not apply. Please explain how reducing congestion won't induce more traffic through the project area.

Attachments: N/A

2019 0307 Paul Jeffery 3

Comment: I oppose this project because you could get all the congestion relief (and more!) from a decongestion tax. Do that first, and you'd find you could save all your money! Try it! If I'm wrong, build your extra lanes later.

Attachments: N/A

2019 0401 Paul Jeffery

Comment: I would likely oppose any freeway widening project regardless - considering the ineffectiveness of road widening in general, but the special circumstances of this one make it that much more important that we put a halt to this bad idea.

When you can't even justify the Rose Quarter Freeway Widening project without misstating facts, embellishing, cherry-picking data, or burying the full story, why should we entrust a half billion dollars of taxpayer money to you? Why would we even assume it will stay at a half billion dollars? In fact, we know the history of ODOT cost estimates, so let's just call \$500 million the first lie. You know it'll cost more, and we'll have to pay once you start it regardless.

Lie number two: "induced demand doesn't apply in this case." It's nice of you to admit that induced demand is even a thing, since it has been proven again and again, at the cost of hundreds of billions of dollars and ruined urban cores across the country. But if you did, you'd understand that providing capacity anywhere in the system will generate more demand for that capacity, even with fixed inputs and outputs.

Lie 2.5: the extra lanes will encourage local traffic to use the freeway more, thereby clearing surface streets of traffic. This is another variant of your induced demand lie, but I feel it needs its own number, so I'm upgrading it to lie number three, because of some information we got as a result of another lie down the list- namely, you'll be widening some surface streets anyway. So, we know you know it'll just create more local traffic, because you're designing for it.

The fourth lie is the most cynical. You claim this is a "safety project", and you manipulate statistics to make it seem that this stretch of the road system is dangerous. The data show that there are a high number of low impact collisions - "fender benders" -but a very low number of injury crashes, serious injury crashes, and fatalities, relative to the rest of the ODOT network. Most of the few fatalities were pedestrians, the result of increased homelessness and poor connections across the freeway between neighborhoods, neither of which will be addressed by



this project. Your own data show that the seriousness of a collision is increased proportional to speed, so if you were somehow able to decrease congestion for a short time, speeds would increase, thereby increasing the seriousness of each collision. Even if the raw number of crashes went down, the actual safety danger would increase.

The worst effect on safety, though, is the lost opportunity cost. When you elevate a relatively safe part of the road system to a major safety issue, and spend more money on it than it deserves, real safety issues go unaddressed, and are starved of money to fix them. Nearly all of Portland's most dangerous streets are ODOT-run surface streets. People are dying on them with sickening frequency. Every dollar you spend on a project that doesn't really have a safety problem is a dollar less that could go towards projects that could save lives. This is the insulting part of your safety claim, so it gets its own number: lie number five.

Number six is the improvement to the neighborhood. I don't see any benefit to a couple of poorly thought out "lids", perilous and unusable pedestrian and bike crossings, and widened streets in the area. The increased noise and pollution created by the project will hurt the economic vitality of the neighborhood. Expanding a road right up against a school will hurt the children. Vacant, windswept caps will not not make everything better.

Lie seven is the way you're withholding parts of the plan until it's too late to change them. You know the drawings will be unpopular, once people discover the worsened safety conditions of wider surface streets, the shadow you're putting on our beloved Esplanade, and other details. So you have been claiming the drawings don't exist.

Lie eight: the models depend on projects that never got built. The CRC, another of your favorites, got cancelled, because it was a horrible idea, poorly executed.

Lie nine: you claim this project will improve the air. Your projections, however, are based on things that are independent of whether you build or don't, like reduced emissions of the average car in the future. You can't get credit for that.

Lie ten: there's no other way to solve congestion than this. Well, since this is a big money project that almost certainly won't solve congestion, I don't believe that at all. Tolling, increased support of transit, dedicated freight lanes: all of those would provide better benefit at lower cost.

You've not made your case, and you've lied to the public to keep this project moving forward. ODOT does not deserve our trust. And you do not deserve our tax dollars.

Sincerely,

Paul Jeffery

Portland resident

Attachments: N/A



2019 0402 Paul Keough

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

ODOT is hiding the data. The entire traffic projection information on which ODOT's claims about the purported benefits of this project are based have been made largely inaccessible to our community groups to independently verify. Our coalition has brought on traffic engineers to review the information that should have been available to the ODOT still hasn't released numerous data sets and appendices that would allow our community groups to independently verify ODOT's assertions that this project would lower carbon emissions, improve air quality or lower traffic congestion. ODOT's strategy is to tell the public "trust us, this is good for the community," and isn't providing any of the materials available for us to double-check their dubious claims. Our coalition wrote a letter on March 4th asking for this information and we still haven't received it. How can ODOT claim to be providing meaningful public engagement with the project when they won't even make the data available for the public to review?

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

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

Attachments: N/A

2019 0307 Paul Leitman

Comment: I oppose the I-5 Rose Quarter Improvement Project. There are a number of factors that influence my decision. First, the collisions on I-5 are largely PDO collisions and this region



has much more significant safety concerns on other corridors and roadways (such as 82nd Ave, Division, Powell, TV highway). Secondly, the project focuses on the congestion and delay and responds by adding the auxiliary lane rather than proposing various alternatives to reduce high ways demand or implementing roadway pricing to reduce demand. This is a flaw—the EA should include additional alternatives. This, the plan does not factor in the impacts that reduced delay on the roadway will have on inducing demand and encouraging more use. Portland has multi-modal and climate change goals that are not adequately represented here. Portland's regional priorities are to enhance transit, pedestrian, and bicycle facilities and access and reduce vehicle use. This project is designed to make it easier to drive and therefore is not consistent with established goals and priorities.

Please invest in Portland in other ways. Thank you.

Attachments: N/A

2019 0312 Paul Leitman

Comment: My name is Paul Leitman. I live in Portland. I'm concerned about the rational behind the I-5 Rose Quarter Improvement Project and the lost opportunity to invest limited funds in other projects throughout the region which have greater need. I understand safety is one of the key project objectives. And I do agree that safety is a very important factor to consider. However, the EA safety technical report indicates there were only seven serious injury crashes on I-5 in the study area in a five year period. With limited funds available to spend on transportation projects in our region, we need to be judicious with how we use our resources.

According to Metro's high-injury corridors and intersections report from 2017, MLK Junior Boulevard, McLouglin Boulevard, Burnside Street and Sandy Boulevard had between 30 and 40 serious crashes over a five-year period. TV Highway had 55.

Powell Boulevard 66, 82nd Avenue 75, and Division Street had 80 serious crashes. Like I said, I-5 had only seven. Metro and many local jurisdictions in the region are shifting from a traditional safety approach that focuses on all collisions equally to a safe systems approach where fatal and severe crashes generate the most attention and resources. Metro's 2018 State of Safety report indicate that arterial roadways are the location of the majority of the region's crashes. That freeways and freeway ramps are relatively safe per mile traveled compared to the arterial collector streets. Metro areas arterials have more than four times as many crashes for every 100 million people miles traveled than metro area freeways. Therefore, I'm asking ODOT to consider reallocating the I-5 Rose Quarter funds to reduce the prevalence of serious crashes throughout the region. Taking the triage approach, apply these resource and funds to the locations where action is expected to have a significant and immediate reduction in the number of people who are killed or seriously injured. Thank you for your time.

Attachments: N/A



2019 0401 Paul Leitman

Comment: Comments submitted by Paul Leitman in response to the Environmental Assessment for ODOT's I-5 Rose Quarter Improvement Project

1 April 2019

I am providing the following comments to express my concerns with the Rose Quarter Improvement Project. I also provide suggestions for additional analysis and content that should be added to the Environmental Assessment. I've divided my comments into two sections: Safety & Collisions, and Additional Alternatives to Analyze.

Safety & Collisions

The Environmental Assessment identifies the crash history along I-5 as one of the key justifications behind the Rose Quarter Improvement Project. The EA provides a high-level analysis of highway crashes including total number of collisions, percent with severe injuries, crashes by hour of the day, and contributing factors. The report includes details for 13 different segments along the corridor.

These collision details are important, but they do not clearly analyze or identify the causes of the collisions. Specifically, the report should provide sufficient detail and analysis to provide justification for the new auxiliary lane on I-5. Although the report identifies "following too closely" and "improper lane changing" as the predominant collision types, the EA fails to provide sufficient explanation for the reasons these types of collisions have occurred so much, fails to identify whether these collisions are a direct result of drivers who were margining onto or off of the highway (i.e. did they occur in the outside lane and in between the on and off ramps?), and fails to provide documentation or research of the countermeasures and treatments that have been proven to reduce or mitigate these collisions (specifically whether adding auxiliary lanes actually would reduce these collisions).

Secondly, the collision analysis frequently refers to the total number of collisions or collisions per mile. While these numbers are valid representations, they can be misleading. It is good practice to provide normalized values that accurately represent the roadway layout and how well it is used. For example, collisions should be identified as collisions per lane mile (to accurately reflect the size of the roadway and relative capacity), as collisions per AADT (to accurately reflect overall demand of the roadway), or as collisions per VMT (to accurately reflect overall distance of travel).

Additional Alternatives to Analyze

I'm concerned that the EA does not sufficiently review different options and alternatives that could be used to mitigate the history of collisions along the corridor. There needs to be additional due diligence to demonstrate that adding auxiliary lanes to I-5 is the only option that ODOT can use to address the safety and operational concerns along this corridor (or at least the option with the highest cost-benefit or the least externalities).

Operational changes



For example, (1) what is the impact of modifying the existing southbound auxiliary lane between the Greeley on-ramp and south of the Broadway off-ramp into an exit-only lane onto Broadway? Does the fact that the lane extends a little past the Broadway off-ramp contribute to collisions?

(2) A second potential alternative to analyze is the reduction in the number of lanes on the southbound Broadway off-ramp and the northbound Fremont off-ramp from two to one. Would this reduce the complexity for drivers who are exiting the highway and could it reduce the likelihood that a driver may make an unsafe lane change (simply because there is only lane that they can use to make that exit)?

(3) Another idea that should be considered is closing one or more on-ramps or off-ramps, and to direct vehicles to the ramps that have the fewest conflicts with other entering/exiting vehicles. This would also directly address the documented issue with the on and off ramps being spaced too closely together. I recommend a couple alternatives be added that include ramp closures, and their likely impacts (to highway collisions, highway congestion, arterial/surface street collisions, and arterial congestion).

(4) Lastly, are there ways to slow vehicles down when they are merging onto the highway? Slower vehicles provide more time to react to conditions and decreases the stopping distance should a driver need to stop or slow down quickly to prevent a collision. Would the addition of ramp metering during periods of peak congestion on the I-405 and I-84 ramps when they enter I-5 be helpful to achieve these reduced speeds? Or would the metering directly address the collisions that may be caused by vehicles merging into traffic?

Value pricing

In addition to operational changes along I-5, ODOT should also consider value pricing as a potential alternative to mitigate the collisions. If the collisions are in fact occurring as a result of congestion and a high vehicle-to-capacity ratio, then the key issue is clearly the presence of too many vehicles, not the lack of auxiliary lanes. If designed well, value pricing would charge the smallest toll necessary to reduce the number of vehicles to levels that would result in reliable travel speeds and flow. It is well documented that congestion occurs as a result of a very small number of vehicles being added to a roadway. Sometimes all it takes is to remove very few vehicles from a highway for there to be sufficient roadway space to significantly reduce delay and increase travel speeds.

I urge ODOT to consider using value pricing first as a trial to see if it actually addresses the issues along the corridor. If it does not, then it may make sense to continue with adding the auxiliary lanes. However, it is not a good use of public funds to spend \$400 to \$500 million dollars to add auxiliary lanes when there are other options that are significantly less expensive that may have the same (or much more beneficial) impacts and directly address the project's initial purpose. As ODOT has already begun studying value pricing on this corridor, it makes sense to coordinate both projects and studies to achieve mutually beneficial outcomes.

Transportation demand management

A third series of alternatives for ODOT to consider is transportation demand management, and providing additional transit service in the corridor. This would be a demand-focused alternative,



rather than the supply-focused alternative that is the current Build Alternative in the EA (i.e. the EA should have an alternative that reduces congestion and collisions by finding ways to reduce travel demand, rather than the single alternative now in the EA that responds to the issues along the corridor by adding capacity). The Safety Technical Report indicates noon to 6 pm is the time of day when the most crashes occur. This, however, it is also the time of day with the highest volumes and most congestion. Are there steps ODOT and the City of Portland can take to encourage these drivers to travel at different times of day to spread out the demand more evenly throughout the day?

Are there other investments that can be made in the corridor to encourage people to use another mode? For example, it is likely that people traveling to/from Clark County are a significant percent of drivers along this corridor. Recently the State of Washington restarted discussions to study and fund a replacement to the Interstate Bridge. These initial discussions have included a potential MAX Yellow Line extension as part of the bridge replacement. Would a shift of people (even if small) from I-5 onto the Yellow Line provide any notable reduction in collision frequency? Even if not, such a project could provide a high quality level of travel reliability on the corridor that is not achievable by car. It would give people the option to use a congestion free travel option that avoids I-5 altogether. Travel reliability was identified as one of the project needs in the corridor; and a Yellow Line extension to Vancouver would adequately address that need.

Next, the EA should include an analysis of the general origins and destinations of the people who are traveling in the corridor to identify specific TDM measures and other strategies to reduce travel demand on I-5 and minimize the travel demand as a means to reducing collision frequency.

Lastly, the EA should directly note the important contribution of density and land use mixing on vehicular demand and congestion. Currently as written, the EA provides a very narrow focus on the I-5 corridor and fails to accurately identify the much larger systemic cause to the collisions and congestion: vehicle dependency, and spread out land uses. Consolidating land uses into compact, walkable, mixed-use areas, centered around high-capacity, frequent and congestion-free transit stations throughout the region is an important step that would lead to reduced vehicle dependence, and therefore reduced traffic, congestion and collisions on the region's highways.

Flint Street Bridge

The Build Alternative recommends the demolition of the Flint Street Bridge to accommodate the widening of I-5. I'd like the EA to identify if there are ways to widen I-5 while preserving the bridge, or to consider including a new Flint Street replacement bridge in the Build Alternative. I do like the new Hancock/Dixon Street Bridge that is proposed as part of the Build Alternative. However a new east-west bridge does not compensate for the loss of a north-south connection. It is well documented that high levels of street connectivity and network redundancy is important to improve walkability, reduce congestion and enhance the value and development potential of land. Therefore ODOT should do its due diligence to explain why it is not possible to have bridges for both Flint Street and Hancock/Dixon Street across I-5.



Attachments: [2019 0401 Paul Leitman ATT](#)

2019 0327 Paul Millius

Comment: As a frequent user of the NE Broadway Entrances to I-5, I strongly support the expansion of lanes to better accommodate those merging off and onto I-5 at that point. The current set-up invites fender benders as drivers weave in and out. Paul Millius

Attachments: N/A

2019 0228 Paul Philpott

Pacific NW Regional Council of Carpenters

Comment: As a carpenter who works in the area I support the I-5 rose quarter project and urge you to as well.

Attachments: N/A

2019 0312 Paul Philpott

Carpenters Union

Comment: My name is Paul Philpott. I am a representative for the Carpenter's Union, a recent transplant from Gresham to Rainier. I thank you for your time. And I would like to say that I do respect the opinions of the people who are opposed to this project. There are concerns. I would say that I would like ODOT to work with them more closely to find ways that make shore sense for the cyclists. But something does have to be done for vehicle traffic as well, because cars are not going away, they are changing. They are still going be there. They are still going to need to get through the city. And I have to take this interchange right here to get home. A lot of times it's really backed up. It's dangerous. And I just think that there is a way that we can make this better for all of us if we work together. Thank you.

Attachments: N/A

2019 0307 Paul Riopel

Cascadia High Speed Rail Coalition

Comment: Freeway expansion or so-called congestion relief needs to be combined with true congestion relieving transportation modes such as high-speed rail on a dedicated cooridor with veteran memorial coliseum serving as the rail depot and an all-new bridge crossing the Columbia River parallel to the BNSF bridge. The most effective way to relieve traffic congestion is to come up with viable alternatives that get people out of their cars. True high speed rail that can get to downtown Vancouver in 6 minutes. See cascadiahighspeedrail.com for additional information.

Attachments: N/A



2019 0312 Paul Rippey

Comment: My name is Paul Rippey. I live in north Portland at St. Johns and I'm going to sing my testimony. In the '60s we built the interstate. In the '70s and '80s, they were working pretty great. In the '90s we said let's add another lane, and now we want to do it again. But the thing we need to understand is induced demand. Now, we all like to drive around town and I know it's been slowing down. But adding more lanes is never done because if we build them, they will come. And the thing we need to understand is the induced demand. I wish Tom McCall was still alive. He tore down Harbor Drive. And now Dennis Buchanan has gone away and he stopped the Mt. Hood expressway. Men of courage, men of goodwill, I know we've got that kind of leader still, but the thing we need to understand is induced demand. Now, I know we'll need more buses and MAX, that's just transportation facts. But the way to get the highways off our backs is with revenue neutral congestion tax, because the thing we need to understand is induced demand. In the '60s we built an interstate, let's stop the madness before it's too late, because the thing we need to understand is induced demand. Thank you very much.

Attachments: N/A

2019 0331 Paul Runge

Comment: To whom it may concern--

Thank you for reading.

I oppose the I-5 freeway expansion and ask you to direct those funds to more progressive, equitable causes, like improved public transportation. There are many reasons not to expand the highway: the project primarily serves the elite, it won't reduce congestion, it promotes long commutes and climate change, and tolls should be instituted first to establish a better congestion baseline. But I'm going to focus on another reason that you may not have heard much about yet.

PSU professors Greg Schrock and Jason Jurjevich found that Portland has an unusual ability to attract young, educated workers--a net benefit for the city. You can read about their findings here. The professors argue that Portland's amenity-rich lifestyle acts as the primary attractor of such talented individuals.

I am a young, educated worker considering moving to Portland. My long-term partner is from Portland (she works for Stumptown Coffee and may start working at PDX Headquarters soon) and her parents live in Southeast. Many of my peers and I agree with Greg and Jason. We consider Portland a fantastic long-term place to settle because of its urban amenities: charming neighborhoods with a diversity of shops and people that make life great. Investing in a freeway rather than public transportation, walkability, and bikeability makes Portland a less attractive option for young, educated workers like me.

There are important connections between Portland's investment in walkable, bikeable, and car-optional urban fabric, its amenities, and its ability to attract talent. Portland's investment in infrastructure that reduces driving is estimated to save residents over a billion dollars each year.



Residents, in turn, can spend those savings at local businesses, creating demand for attractive commercial zones in the center of ordinary neighborhoods. This process is called the Green Dividend, and it demonstrates how car-optional places (themselves an amenity) beget interesting commercial activity (another amenity), which in turn attracts talented outsiders who can contribute to the local economy. This cycle is a key part of Portland's success, and it stems from investment in much more progressive transportation than freeways. The city should continue investing in that cycle rather than a competing, climate-change promoting form of infrastructure. I understand a decision in favor of the freeway will not erase Portland's amenity-rich cityscape, but it will undermine it and step the region in an unsustainable and inequitable direction. Please oppose the expansion.

Thank you very much,

Paul Runge

Attachments: N/A

2019 0328 Paul Schroder

Comment: My name is Paul Schroder. I oppose the Rose Quarter expansion. Best. Paul Schroder

Attachments: N/A

2019 0308 Paul Sheprow

Comment: This project will not reduce traffic, is not consistent with Portland or Oregon's transportation goals, and will accelerate climate change. It is a bad idea and should be abandoned in favor of congestion pricing and other tools.

Attachments: N/A

2019 0313 Paul Sochacki

Comment: Somehow we have found \$500M to widen a freeway to promote more people driving, but still can't find the money to replace the crumbling I-5 bridge or extend the MAX across the Columbia to alleviate traffic at its core... this is ridiculous.

Attachments: N/A

2019 0331 Paul Souders

Comment: To whom it concerns,

I oppose the proposed Rose Quarter expansion. There are lots of policy reasons for opposing it, which I know you're hearing all about from wonky types: It won't relieve congestion. It justifies itself with cooked data. It's a ridiculous waste of money. The process supporting it lacks



transparency. It's a slap in the face to our climate change commitments. It is YET ANOTHER insult to integrity of the neighborhoods it runs through, who have already dealt with a century-plus of redlining and "urban renewal." It's a nightmare for transit, biking and walking.

Who thought this was a good idea, really? Maybe Vancouverites think this is a good idea, but why am I paying to trim a Washingtonian's commute? Which it doesn't actually do anyway? I love Vancouver and all but are they footing the bill for this?

This whole boondoggle is lazy, expensive, harmful and undemocratic. It's such a transparently bad idea, presented in such transparently bad faith, that I can only guess it's thoroughly crooked. As such it fits perfectly with the new national political mood these past 3 years. OREGON IS BETTER THAN THIS. It's not why I moved here twenty five years ago. I didn't move here for acres of elevated pavement and bumper to bumper traffic. Nobody loves places like that. They are nasty and inhuman. Great for machines but lousy for people. I lived in Social for like a year, and I lived in Texas too, I know what those places are like. They suck. Oregon should take no cues from them.

As I'm writing this I realize I'd be down with decommissioning I-5 entirely between the 405 interchanges. That's how lousy this expansion is, as an idea: it argues against itself. The more you think about it, the more you realize that not only should you NOT do it, you should do the OPPOSITE of it. This is the "we should eat at Arby's" of infrastructure plans.

Look, we get the places we build for. If we build for people, we get people. If we build for cars, we get cars.

Do the right thing for Oregon and smother this bad idea before it goes any farther.

Attachments: N/A

2019 0311 Paul Vandenberg

Comment: The state of Oregon has an opportunity to provide a model approach to this issue, consistent with our history of progressive statewide planning, and in alignment with current City of Portland development plans. The real issue is not traffic slowdowns on I-5; those won't go away. Expand the freeway and we'll eventually get expanded congestion. The abundance of information available today points directly to the real issue: quality of life - local and global. As such, we should be spending public funds on development options that keep people off the freeway to the extent feasible.

Attachments: N/A

2019 0401 Paula Wichienkuer

Comment: I'm a physician, parent, and concerned NE Portland citizen that wants our city to have sustainable and healthy transportation. The Rose Quarter Freeway expansion will not



promote this. It will also cause more air pollution for our middle school Harriet Tubman at a time in life when children should be engaging in lots of physical activity.

Please do not go forward with this freeway expansion.

Sincerely,

Paula Wichienkuer MD

Attachments: N/A

2019 0314 Paulette Meyer

Comment: Message: More public transportation and fewer cars to lessen air pollution in PDX. Save the school for children and keep heavy traffic out of residential areas.

Attachments: N/A

2019 0311 Peg

Comment: Dear ODOT, We do not want a highway expansion project in Portland. We are smarter than this. In our community we have multi-modal needs and opportunities to enhance, create and reimagine an end to our obsession and addiction to the use of fossil fuels. Stand up for the health of our planet. Take a strong stance, here and now. Turn around. Create a healthy State and City by choosing green, clean energy alternatives.

Attachments: N/A

2019 0325 Peter Banka

Comment: Please DO NOT DO THIS PROJECT. Let's retain the mantle of leadership in this country as a city and a state that takes environmental concerns seriously. This project is simple climate-denialism. It's time for Oregon to get serious about solving transportation problems and not creating new ones.

Attachments: N/A

2019 0401 Peter Duplissie-Johnson

Comment: Hi there,

I am really concerned that this plan is in direct opposition of the city's "pledge to our children's future." While transitioning to renewables seems intelligent and insightful, doubling down on fossil fuel usage by expanding a highway does not. Could this money not be better used for expanding the range of the MAX? Does adding lanes reduce congestion or incentivize driving? Would providing more globally conscious alternatives actually decrease congestion and also serve Portland as a more long term solution in the face of climate change?



Thanks,

Peter Duplissie-Johnson

Attachments: N/A

2019 0401 Peter Dydo

Comment: After going over the online open house, this project seems to have many valuable positive impacts to the Portland Metro area. However, after taking a deeper review into materials not posted to the online open house, the positive impacts to the community appear to be far less clear. I believe that an environmental impact statement should be conducted before this project moves forward. Any analysis conducted to support this project should also include the data sets from which it was derived. The data should also be presented to the public in a more transparent manner. There appear to be several fundamental questions that have major impacts on traffic analysis which this environmental assessment does not account for. An example of this is how the Columbia River Crossing and/or Value Pricing of I-5 impact this project. It is unclear from the environmental assessment, or any other supporting document which I was able to find, if these projects are included in the analysis conducted for the environmental assessment. This project seems to sell itself as one which would provide auxiliary lanes between the interchanges of I-84 and I-405 on I-5 in the open house, but after reviewing supplemental information this is not the case. The project is proposing adding an auxiliary lane NB from I-84 to the NE Greely exit and SB from I-405 to Central Eastside Industrial exit, this is an extension of widening by one exit further north and south than described in the open house. This has major implications on cost and infrastructure considering both of these sections are built entirely on viaducts. Furthermore this project would introduce 4 breakdown lanes in an extremely constrained urban corridor. Considering the circumstances this design element should be taken as a consideration to be evaluated for its impacts not set as the default. More alternatives should be researched for this project. The environmental impacts reported in the environmental assessment do not conform to historic norms of highway widening projects which tend to increase greenhouse gas emissions not decrease them. It is not clear how this conclusion is reached and further analysis should be conducted. The impacts to the local street network seem to be reported as positive in the environmental assessment, but there appears to be significant concern from City officials and community groups. It is also unclear how this project will incorporate a local plan for the area to revitalize and redevelop the area known as the 'Albina Vision'. The leader of the plan has recently expressed concerns about this project and how the two overlap.

Attachments: N/A

2019 0327 Peter Englander

Comment: I drive this section of highway often enough to know it's limitations and believe that widening the freeway will have no positive impact on either traffic flow or safety - redirecting



traffic through congestion pricing and pushing alternatives to SOV so that freight can continue to move quickly is where the focus should be. We, here in Portland, should be way above building more and wider freeways at this point.

I'm also a very big supporter of the Albina Vision Trust's request to build lids that can support buildings to reconnect this area to the historically black neighborhood to the north and give this city a chance to repair the significant damage we've caused to communities of color, particularly our Black brothers and sisters.

We must take a more regenerative approach to our transportation solutions

Peter Englander

Attachments: N/A

2019 0226 Peter Herring

Comment: The IPCC gives us no more than a coupled decades to transform our fossil fuel driven economy to a sustainable, non-greenhouse gas economy. That means we must find ways to have less travel by automobile, not more. It is ludicrous to consider a freeway expansion when we know that cars are one of the greatest contributors to greenhouse gas emissions. Monies need to be spent on alternative transportation while cities need to be redesigned for more walking/biking and less traffic. Work, living, and shopping spaces need to be closer. No more freeways or freeway expansions. Not if we want a future.

Attachments: N/A

2019 0401 Peter Koehler

Comment: ODOT -

I am a lifelong Portlander. I have my Master's in Urban Planning. I run a small business. I care deeply about our city, our region, and our state.

I am strongly opposed to freeway expansion in NE Portland. This will not solve our problems, and over the long run, it will simply make them worse.

The proposed expansion is the very definition of short term thinking. As planners and policymakers and builders, we have a responsibility to fight against short term thinking and to design cities and places with the long term in mind.

Spending \$500m to expand a freeway that will fill back up in short order will a) not improve the congestion in the long run; b) will increase pollution and make air quality worse; and c) will contribute to climate change.

We do not want any of these things. Think of all the ways we could spend \$500M - why go this route?



Furthermore, and perhaps most harmfully, doing a project against the will of the community and the people who would be most affected by that project is fundamentally a deeply cynical and harmful way to govern.

Please heed the calls of the hundreds of individuals and organizations who are requesting an expanded EIS. This is the most basic of your responsibilities.

Additionally, you have a responsibility to study and share multiple alternatives to this freeway expansion. If your goal is to reduce congestion, there are many ways to achieve that goal that will be more effective and result in fewer negative externalities. Get creative, and you will surprise yourself at the compelling alternatives you can generate.

Thank you for listening and doing the right thing.

Peter Koehler

Attachments: N/A

2019 0219 Peter Seaman

Comment: Good day:

I'm writing to express my opposition to the I-5 widening project in the Rose Quarter.

In these times of tight budgets, it seems unconscionable to consider spending a half-billion (BILLION, with a "b") in taxpayer funds when you haven't yet considered whether other methods, such as peak-hour congestion tolling, would solve the problems that the project purports to solve.

The half-billion (with a "b") could go to other more worthy projects, such as making safe the many deadly arterial streets and highways that ODOT is responsible for. The stretch of I-5 you propose to widen has not seen any fatalities in recent years.

And where is your commitment to reducing air pollution, greenhouse gases, and noise pollution? Making it easier for people to get in their cars and drive alone is only going to exacerbate these other problems.

This is not a project for Portland in the 21st century. I wish you would NOT pursue it. Thank you.

Peter Seaman

Attachments: N/A

2019 0329 Peter Welte

Comment: I'm deeply distressed by, and opposed to, the proposed I-5 Rose Quarter freeway expansion project. I believe between the information provided in the Environmental Assessment, and the information clearly left out of it, even the most casual observer can clearly



see a full Environmental Impact Assessment is required to determine the extent and scale of the significant human and environmental impacts this project will very likely have.

Here are just a few issues identified during a cursory read in the small allotment of time this reader had available due to ODOT's small comment period window.

- * Increased noise from faster and more freely flowing, traffic along Eastside Esplanade.
- * Additional noise and air toxin concerns along Esplanade will reduce active transportation use. Given how essential this infrastructure is to a very large number of bike commuters in Portland, this puts in grave danger the city's own biking and walking goals as spelled out in the city's planning documents.
- * Reduced use of Eastside Esplanade will lead those who would be biking to instead drive (along a now freer flowing freeway, in fact), and this modality switch will clearly lead to an increase in carbon emissions.
- * Increased overhang and shadow from the expanded I-5 near the esplanade (in particular the west side of the SB ramp near I-84) could severely degrade the ability of plants along the multi use path to grow (and potentially threatens their very existence depending on the as of yet unstudied shading effect). The then decreased vegetation could have severe impacts on local native habitat, water quality, and would increase noise levels due to a lessening of the vegetative buffer effect.

Attachments: N/A

2019 0330 Peter Welte

Comment: The Environmental Assessment's climate analysis has an obvious flaw:

Both the build and no build alternatives share the same flawed assumption of a "highway engineering as usual" approach to transport planning and urban development. In this highway engineering dream world, every single project within the metro area's transport wishlist (Regional Transportation Plan) is built, including the Columbia River Crossing mega freeway expansion. Any traffic project built for this hypothetical future would carry with it a commensurate mega-expansion in reliance on single occupancy vehicles and their related VMT -- something with obvious and direct emissions impacts even *if* everyone were to switch to electric vehicles, due to the nonzero emissions from vehicle production and energy production of even the "cleanest" cars and the "cleanest" energy sources.

A more realistic and appropriate carbon analysis would consider the following two possibilities:

Partial Build:

In this scenario, only a subset of the Metro RTP projects are built, starting with those that are fiscally achievable given identified funding sources. As the Columbia River Crossing mega freeway expansion project died due to lack of funding when the Washington Legislator declined to fund it years ago, this project would obviously not be on the list of projects assumed in the



"partial build" list. Without the additional traffic generated by that freeway widening project, the carbon emissions estimates of the no-build scenario would be much lower, as you wouldn't have nearly as much backed up traffic in the Rose Quarter.

Alternative Build:

In this scenario, the Metro area takes serious action on climate. The build list assumed here would be those projects most likely to facilitate biking, walking, and transit. In this case, the actual carbon emission impacts of the build alternative would be more accurately highlighted for their unique contribution to Portland's carbon emissions.

Attachments: N/A

2019 0330 Peter Welte 2

Comment: The Environmental Assessment's climate analysis has an obvious flaw:

- The no-build scenario is estimated to higher maintenance-related GHGe emissions (134MT/year) than the build-scenario (94MT/year). Yet because the maintenance emissions are related to the area of roadway surface (emissions from processing of materials), the larger built-out scenario will obviously have higher annual emissions. So where does this logical fallacy in the EA come from? A magical sort of thinking where the freeway (or at least its emissions) somehow disappear come year 2045. A more accurate analysis would calculate the maintenance based on a normalized long term time frame that more accurately represents the fact that roads don't disappear after project analysis scope windows pass.

Attachments: N/A

2019 0331 Peter Welte

Comment: We should note, for the record, that the I-5 Rose Quarter Freeway Expansion Project's Environmental Assessment section on Climate Change begins half-way down page 33 and ends on page 35.

To highlight the fact that an Environmental Assessment is of insufficient scope and depth, it's useful to compare the 2.5 pages of analysis in the EA to a previous ODOT project along the same roadway but just a few miles north: the CRC (Columbia River Crossing). That project conducted a full Environmental Impact Analysis and has an examination of GHG/climate impacts which is about four times as long [1].

If we are going to spend half a billion dollars on a project, it is imperative that the projected carbon emission reductions represent a solid return on our investment, and to tell if that is the case the analysis on GHG emissions should compare the build scenario with 1) a scenario where we invest an equal amount in local biking, walking, and transit improvements, and 2) a scenario where very little is spent on infrastructure itself except for that needed to implement a



decongestion pricing schema. If ODOT were to do this necessarily rigorous analysis, the EA (or EIA) would have a climate change section weighing in at at least a dozen pages, but in reality all we got was 2.5.

So when the kids run out of water during summer because Bull Run never freezes, and they ask ODOT what they were doing when the world was beginning to melt, the answer it appears will be "Not doing our homework."

1: CRC Final EIS, Chapter 3 pages - 3-439 to 3-447

<http://library.state.or.us/repository/2011/201109191128141/3.19.pdf>

Attachments: N/A

2019 0312 Phil Richman

Comment: Hi, my name is Phil Richman from Portland. Thanks for the opportunity to speak today. Most people here have actually already said what I've thought. I did bring a couple pictures just to remind myself. One is a rendering of the project. The other is a rendering of the Albina vision. I'm assuming both of you have seen these renderings. And what's disturbing about them is the fact that this ODOT project seems to be moving forward which makes the Albina rendering impossible. And so I'm wondering to myself what are telling these people who have been pushed out and are working so hard to develop this vision that is completely pie in the sky. And then at the same time, what are you telling people to convince them to get out of the single-occupancy vehicles which has gotten us into this mess in the first place. Why does the environmental assessment not have any dedication towards freight or transit thru-lanes, but instead just offers the same mess we're already I was just in Florida a few months ago where they're raising now over a billion dollars a year in toll revenue. Unfortunately, they're only using that revenue to build new highways. When you go there, if you've been there, I see you smiling, you will find yourself sitting in traffic. So what we're signed up here for is more of the same. And I'd encourage you as a city council member, Commissioner Eudaly, because I have a tremendous amount of respect for you, to use your leadership to oppose this, and we have your back.

Attachments: N/A

2019 0329 Phil Sano

Comment: Is this all we should expect from ODOT? Zombie Freeways?

It seems every year a new freeway expansion proposal is made. Every year we are told this project will solve traffic problems. Every year the data is massaged to accommodate incredulous projections.

The monstrous Columbia River Crossing proposed a similarly unnecessary freeway expansion under similarly faulty projections of increased demand. I saw those well-paid consultants laughed out of meeting rooms. At public meetings they were brutally mocked for wasting our



public funds on a boondoggle that would have tied up all our state's transportation money for a decade. This project uses data that presumes a massive new I-5 bridge across the Columbia River will be built. Once again, Zombie Freeway rises from the dead to prey upon the living.

It doesn't have to be this way. We could work together to examine and address traffic concerns. We could build infrastructure that doesn't contribute to childhood asthma. We could repair our existing bridges that are rated by the Army Corps of Engineers as "Poor" or worse. We could make a plan that takes into account the greatest threat to human life on this planet; call it climate change, call it global warming, but rest assured we won't be calling it business as usual. We could do all this and more if ODOT wasn't solely focused on trying to build its way out of congestion, which, due to induced demand, has never worked. 1000s of cities across the planet have shown this to be true: if you build it they will come. Cars are already the number one cause of death for those under 37. Wider freeways means more cars, which means more death.

Please stop throttling the future by burning the past.

Attachments: N/A

2019 0226 Philip Brunner

Comment: We should not be expanding any freeways, period. It won't create faster commute times (induced demand) but even if it did, it wouldn't be the right thing to do. The consensus is that we need to be reduce our carbon footprint and spending money to improve access for primarily single occupancy vehicles is the opposite of that. Anytime we are spending money on transit, it should be spent on improving and prioritizing public transportation and building walk-able and cycle-able communities. I haven't even gotten to the public health issues, especially considering this is right next to a middle school where it is recommended that the kids not play outside due to health concerns. The fact that people are able to sit with that being OK, let alone doing something to make it worse is very concerning. Please no more freeway expansive, especially in the middle of our "progressive" city. Let's find ways to lead on climate change and transition QUICKLY off our dependency on fossil fuels and single occupancy cars.

Attachments: N/A

2019 0315 Philip Cooper

Comment: The Rose Quarter/I5 expansion project is completely environmentally unethical, as you well know, not only for the children who live and go to school alongside this stretch of I5, but in the larger context of the ticking time-bomb that is climate change. Portlanders do not want this project. We want economically responsible alternatives like congestion pricing. We would also like you to prioritize safety on other ODOT 'owned' streets that run through the city.

Attachments: N/A



2019 0313 Philip cox

Comment: I am in FULL support of this project to remedy the bottleneck at the Rose Quarter

Attachments: N/A

2019 0327 Philip H Fensterer

Comment: Do you think the resources of the planet are infinite? When you pave more habitat for more lanes and those lanes fill bumper to bumper, you lose again.

What historical evidence proves otherwise? None.

You are just trying to appease those who know no better.

Spend that money getting people out of their cars and embracing a healthier lifestyle. Spend that money on education and help the birth rate fall.

When we voluntarily have fewer people, guess what, less congestion.

Attachments: N/A

2019 0401 Phillip Kast

Comment: Hi,

I'd like to submit a comment opposing the Rose Quarter freeway expansion project:

I have many concerns about the project, but chief among them is the opportunity cost of spending so much money for a relatively short portion of freeway. The approximately \$500 million is about 1/3 of the cost of the MAX Orange line (a third of a whole new light rail line!).

It's enough money to radically overhaul bike infrastructure all across the Portland area. Rebuilt separated bike lanes throughout the city (and other improvements) could put Portland back on the cutting edge of bike-friendly cities, make bike transportation dramatically less intimidating to new riders, and even save some lives in the process!

Like many other opponents, I also don't believe a freeway widening will improve traffic flow. It's more likely that - as has happened in many similar projects - the higher capacity will encourage more traffic and worsen the problem. I believe that along with expanding public transit, congestion pricing is the right approach to reduce traffic. But for some reason, exploring congestion pricing seems to be a lower priority than the Rose Quarter project. That's very disappointing.

Increasing car traffic capacity in the center of Portland doesn't make any sense for the city's long term future. Let's see some alternative plans that move us towards a less car-centric future instead.



Attachments: N/A

2019 0307 Phillip Richman

Comment: The Environmental Assessment fails to consider the future impact of Congestion Pricing/Value Pricing. Congestion pricing should be worked on first. The Environmental Assessment cites safety as a benefit with no evidence presented regarding the current dangers as compared to other areas along I-5, most notably the Maruga Bridge just to the south.

Attachments: N/A

2019 0401 Phyllis Trowbridge

Comment: Dear ODOT,

I am writing this morning to urge you not to go ahead with the Rose Quarter freeway expansion project currently under consideration.

There are so many reasons why freeway expansion is not the solution here:

- For decades we have relied on fossil fuels for transportation even though we have also known for much of that time how they contribute greenhouse gases that are causing climate change. So it is madness that in 2019 we are still thinking freeway expansions are going to help. Experience has shown again and again that freeway expansion actually does the opposite. This is not the way future to a carbon neutral world.

- the children in Portland, particularly at Harriet Tubman middle school deserve better than this. They lose part of their schoolyard and gain more emissions so much so they can't use the yard they have. How does that make this a viable project?

- Freeway expansion seems like such a useless way to spend 500 million dollars. What about investing this money into alternative forms of transportation such as bus rapid transit lines or fixing roads and sidewalks and awkward interchanges where traffic backs up due to lousy design?

I implore you to study and implement decongestion pricing and conduct a full environmental impact assessment before going further with this freeway expansion idea.

I am frustrated as anyone about traffic and pollution in Portland. But our climate is changing and I believe and fear we are in for a rocky future no matter what. But I am certain that freeway expansion is not the right direction. For the sake of our future, for our children and for the earth, stop this plan immediately, please!

Respectfully,

Phyllis Trowbridge

Attachments: N/A



2019 0312 Pia Welch

Portland Freight Committee

Comment: Good afternoon. My name is Pia Welch, and I am the Chair of the Portland Freight Committee that is an advisory to the Portland City Council and Mayor's office. I am familiar with this project as this section of the freeway is part of my daily commute to my job at FedEx Express where I do logistical planning. We've also had a few of our Portland Freight Committee members serve on the north/northeast quadrant plan stakeholder advisory committee keeping us up to date on the project particulars. We look forward to the work being done to improve the most congested freeway interchange otherwise known as the red stop light on I-5. The addition of auxiliary lanes is a welcome safety improvement. We know from other auxiliary lane projects that crashes can be significantly reduced. Real shoulders will allow for better access for emergency response vehicles. We also look forward to better ridability in an important transportation corridor. This is truly a multi-modal project where significant investment is being made in pedestrian, neighborhood, and bicycle improvements. Thank you for your time.

Attachments: N/A

2019 0307 Piper Wyrick

Portland Youth Climate Council

Comment: I am concerned that the expansion will increase air pollution (more freeway = more cars = more air pollution), in turn harming people, causing bad health effects, and more danger from traffic, especially for those living nearby (inequity!). In addition, Tubman MS students already have to deal with excessive amounts of air pollution, when any is too much, and it is especially harmful for kids' development (kids also breathe more per pound of body weight than adults). Freeways also present hazards (crashes!) and will even encroach on school grounds, further decreasing the safe spaces for those students. Please do not expand the I-5 Freeway.

Attachments: N/A

2019 0328 Portland Public Schools

Comment: Portland Public Schools (PPS) appreciates the Oregon Department of Transportation's (ODOT) and the Portland Bureau of Transportation's public involvement, planning, and design efforts to improve public safety and enhance pedestrian/bicycle mobility in the I-5 Rose Quarter area. PPS also appreciates the opportunity to review and comment on the I-5 Rose Quarter Improvement Project Environmental Assessment (EA) published on February 15, 2019.

PPS owns and operates two properties within the study area of the EA. These properties will be impacted by the proposed "Build Alternative" identified in the EA. Harriet Tubman Middle School (Tubman), located at 2231 N. Flint Ave., is located directly adjacent to the I-5 right-of-way. The immediate adjacency of this site to the proposed project presents significant risk for the school



to have short and long term impacts from the proposed project. The location and scope of the proposed improvements and presence of a young, vulnerable population, require that the highest standard of care be applied to the consideration of the proposal. Additionally, the district's headquarters, known as the Blanchard Education Services Center (BESC) located at 501 N. Dixon St., potentially could also experience impacts from changes to local street patterns adjacent to the site.

The EA, issued by ODOT, 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.

PPS has completed an initial review of the EA, however the limited time provided to review this comprehensive document (approximately 6 weeks), has not afforded PPS time to complete an in-depth review and analysis informed by outside consultants or experts. Even though PPS's initial review is only cursory, a number of potential significant short and long term impacts have been identified. Additional time and information will be necessary to compile a more thorough list of concerns. Below is a preliminary list of concerns and questions:

- Air Quality. The SW corner of Tubman is currently located only a little over 50 feet from the closest north-bound lane of I-5. This project will reduce that distance to less than 30 feet. On the north side of the school, students spend time outside before, during, and after normal school hours. Many assumptions have gone into estimating the impact of this project on future automobile emissions. In addition, great weight appears to have been given to projections of future automobile emissions, including the basic assumption that expanding I-5 will result in a long-term decrease in congestion, which is not universally accepted by knowledgeable analysts. Since Tubman is occupied by almost 500 young students, this complex issue demands a more thorough analysis, understanding, and description of all variables and unknowns. ODOT has yet to release the assumptions underlying the findings on air quality, making it impossible to evaluate any conclusions in the EA.

- Soil Stability. The site of Tubman Middle School is known to contain poorly compacted fill material. The proposed changes to I-5 are situated within feet of the existing Tubman school building, prompting several questions that have not been answered. For example, how will ODOT ensure that the design and construction of the proposed changes will not negatively impact PPS property or the Tubman school? How will ODOT design and construct any retaining wall elements adjacent to the site to not interfere with the timber pile and micropile foundations that are at Tubman Middle School? Have these issues even been considered in the development of the project?

- Sound Wall. ODOT is proposing a sound wall along the right-of-way adjacent to Tubman Middle School which prompts additional questions: How will ODOT ensure the design of the proposed improvements and the construction of the proposed improvements will not negatively impact PPS property or the Tubman school? Does ODOT's proposed sound wall start at the top of the retaining wall that would be required to expand the freeway, or would the required height



for a sound wall be included in the overall height of the retaining wall? How will the wall affect air flow around the school—could it funnel even more pollutants into the air surrounding Tubman?

- Noise. ODOT discusses noise levels that were monitored and their predicted future levels at multiple locations along the right-of-way. However, looking into the locations and their relationships to the project site, they do not appear to provide a model that is similar to the relationship of the Tubman site and the project site. None of the locations where noise was monitored are as close to the project site as Tubman is (50'), and none of the monitored sites have similar elevation profiles in relation to the project site as Tubman Middle School has. All of the monitored sites are currently buffered from the project site by distance, elevation change, or adjacent buildings, and foliage. How will ODOT design noise mitigation requirements without exact noise measurements at a school that is one of the closest, least buffered, properties adjacent to the project site?

- Construction. ODOT's proposed project area is directly adjacent to the Tubman site. ODOT's proposed design would install new travel lanes less than 30 feet from Tubman school. There are several hundred students in the Tubman site every day during the school year from August through June. How will ODOT's project plan minimize or mitigate potential impacts to the learning environment of those students during the construction phase of the project? How does ODOT propose to construct the new lanes closer to the Tubman site? Will ODOT need to access the Tubman site to execute their project plan? What dust and noise control measures will ODOT put in place to minimize or mitigate potential impacts to the learning environment at the Tubman site? What kind of vibrations will be felt in the building?

- Traffic. Changes to the routing of local streets during and after construction have the potential to change the level of service on local streets and intersections receiving traffic being routed from closed streets (N. Page St./N. Vancouver St. and N. Page St./N. Williams Ave.) and from the addition of new streets (Hancock/Dixon Crossing). These changes in traffic and pedestrian patterns will have both direct and indirect impacts on both the Tubman and BESC sites and may increase risk of injury for students and staff. We are particularly concerned about whether it is feasible for school buses to use Tillamook Street.

The potential impacts of the proposed project to Harriet Tubman Middle School are particularly troubling. The Harriet Tubman Middle School opened in 1952 as Eliot Elementary School. The neighborhoods served by Tubman have traditionally been more diverse than most other schools in the district. Additionally, the Eliot and Albina neighborhoods suffered some of the most significant impacts from freeway and urban renewal projects in the latter half of the last century, from poor health outcomes from environmental hazards to gentrification and dislocation. City and state agencies are required to apply both an equity lens and a public health lens to project planning. The historical legacy of damage to these communities demands that the proposed I-5 Rose Quarter Improvement Project receive a higher level of scrutiny to ensure the negative consequences of past projects are not repeated.

The creation of Tubman Middle School in the early 1980s at the former Eliot School had historical significance, as it played a pivotal role in the struggle over school desegregation and racist busing policies in Portland during the 1960s-1980s.



Additionally, Tubman reopened as a middle school in 2018 as part of a district-wide Middle School Framework to provide students with a more comprehensive middle school experience and better preparation for high school. The Framework is now in its second year of implementation. The long term successful implementation of this Framework depends, in part, on students being educated in a building free of concerns related to impacts from project construction and longer term impacts from ambient air quality, noise, and vibrations.

Enrollment at Tubman has traditionally been more diverse than other schools in the district. The current enrollment of 491 students is 40.5 percent African American and 14.9 percent Latinx, and 73.5 percent of the students are considered historically underserved. Districtwide averages by comparison are 16.3 percent and 8.9 percent for Latinx and African American enrollment respectively, with 49 percent considered historically underserved.

Attachments: [2019 0328 Portland Public Schools ATT](#)

2019 0301 Prescilla Celino

Comment: Hello,

I am opposed to the Rose Quarter Freeway Expansion Project because it is a wasted opportunity to support city and state commitments to Vision Zero and climate goals.

Thank you,

Prescilla

Attachments: N/A

2019 0331 prettypenguin999

Comment: I don't want esplanade users to have to breathe in more emissions. I don't agree with widening the expressway.

Attachments: N/A

2019 0329 Qiqi de Graaf

Comment: My name is Qiqi de Graaff and I am a NE Portland resident writing to voice my concern with the proposed I-5 Rose Quarter project. I believe we should be focusing our efforts and dollars towards projects that reduce our dependency on vehicles. I also believe it is irresponsible to not consider congestion pricing as a reasonable alternative to this project. I strongly believe that that implementing tolling or congestion pricing should be first priority given it has been proven effective in other cities at a much lower cost.

In short, I do not support ODOT's plan for the I-5 Rose Quarter and I believe it goes against Portland and Oregon values to even consider such a project.

Environmental Assessment Comments

First Name Begins with PQ



Qiqi de Graaff

Attachments: N/A

2019 0327 Quinland Thompson

Comment: It is in no way worth the negative impact to the environment, the loss of taxpayer dollars, or the time, energy, traffic increase during construction etc., to put into effect a project that has not been proven to make any positive difference. Following through with this project would be an embarrassment to a community that claims to be environmentally conscious, transit friendly, and a supporter of local businesses.

Attachments: N/A