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April 1, 2019

Oregon Department of Transportation
Attn: Megan Channell
123 NW Flanders St.
Portland, OR 97209
info@i5RoseQuarter.org

RE: I-5 Rose Quarter Freeway Expansion Environmental Assessment Comments

Dear ODOT:

Thank you for the opportunity to comment on the proposed I-5 Rose Quarter Freeway Expansion environmental assessment. UGI is proud to stand with the large and diverse No More Freeways PDX coalition. With this letter, we wish to re-iterate that **there is no part of this project that benefits the community – it only undermines the region’s climate resilience, public health, and equitable transportation investment goals.**

The Urban Greenspaces Institute (UGI) works across the Portland-Vancouver metropolitan region to integrate greenspaces with the built environment. We engage with agencies, nonprofits, and the public on collaborative conservation initiatives and how to best leverage our limited public resources to achieve wildlife habitat connectivity, clean water, and public access to nature.

UGI is concerned that the proposed I-5 Rose Quarter freeway expansion will not relieve automobile congestion, but only make it worse through induced demand. ODOT’s transportation demand analysis focuses narrowly on congestion within the immediate I-5 project area corridor and does not consider impacts to the adjacent neighborhoods or to the wider region.

We were troubled to learn that ODOT modelers assumed the moth-balled Columbia River Crossing would be built but did not consider or integrate a decongestion tolling scheme. The latter is much closer to implementation. This type of ‘gaming’ of ODOT’s transportation demand modeling undermines the project analysis and jeopardizes public trust in the agency.

The reported air quality benefits from the project are minimal, and we dispute ODOT’s findings that the project will actually benefit local air quality. We suspect the project may actually worsen public health conditions within the project corridor, particularly for the historically marginalized Albina African-American community and students of Harriet Tubman Elementary School.

ODOT's conclusion that most impacts from the project are short-term and relate only to construction-generated noise, dust, and traffic impacts is myopic. It disregards and underestimates the project's wider regional impacts to greenhouse gas emissions, public health, and community livability. Devoting \$500 million to a single large automobile congestion-relief project carries heavy opportunity costs: it diverts limited public transportation funds away from needed investments that improve public health, reduce automobile dependency, and strengthen our transit, pedestrian, and bicycle transportation networks.

The I-5 Rose Quarter freeway expansion project moves us away from climate justice, and distracts us from creating inclusive, resilient solutions to the climate crisis. The people of the region and the State deserve better. Please redo your analysis and complete a full Environmental Impact Statement that more thoroughly analyzes and prescribes appropriate mitigation. Within the strengthened and expanded EIS, please consider how regional decongestion tolling could reduce or even eliminate the need for this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Labbe". The signature is fluid and cursive, with the first name "Ted" being the most prominent.

Ted Labbe, Policy/Program Director
Urban Greenspaces Institute
ted@urbangreenspaces.org
503-758-9562