



4145 NE Cully Blvd. Portland, OR 97218  
www.verdenw.org

## **RE: Rose Quarter Improvement Project Supplemental Environmental Assessment Comment Period**

Dear Project Manager, Interstate 5 Rose Quarter Project,

Verde is an environmental justice organization serving BIPOC and low-income communities such as NE Portland's Cully neighborhood, where we do much of our work. We focus our efforts on community-identified priorities like a clean and healthy environment, good jobs, and access to housing and transportation.

Despite a foundational commitment to equity, the benefits of Portland's widely admired sustainability movement have not been accessible to or inclusive of low-income, BIPOC neighborhoods. Recognizing this, we evolved and expanded our programming to address up-stream causes of environmental and racial injustice. Therefore, we follow large-scale infrastructure projects and the policy setting that accompanies these projects to ensure the environmental, social, economic and racial equity impacts don't perpetuate further harm.

We have concerns about the impacts of the proposed Rose Quarter Freeway Expansion (RQP). The stated goals of the proposed Interstate 5 Rose Quarter Freeway Expansion are to reduce congestion and improve safety. Decades of research show that projects that expand road capacity will induce more vehicle miles traveled, which decreases safety and increases congestion. This project raises substantial questions about the potential negative environmental and public health impacts across the region, as it will increase vehicle miles traveled, which is associated with increased air pollution, greenhouse gas emissions, and the alarming increase of serious injury and deaths on all roadways that impact all road users.



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While this project has the potential to help improve community outcomes through the creation of buildable freeway covers, the creation of lane miles below them undermines many of the goals of a healthy neighborhood where people can live, work, play and learn to their full potential. We fully support the vision and work Albina Vision Trust is bringing forward in this project, including the buildable freeway lids, and we hope the roadway expansion does not come at any cost, including that of the buildable lids.

ODOT and the OTC should conduct a full Environmental Impact Statement for the I5 Rose Quarter Freeway Expansion and to include congestion pricing alternatives to widening the freeway. Congestion pricing and investing generated revenue in public transit, biking, and walking is the best way to increase transportation access for all. While ODOT states that analyzing congestion pricing will be done separately, nothing prohibits the agency from including a congestion pricing analysis in an environmental impact statement of a road project. The need to be good stewards of limited tax dollars, be responsive to the climate crisis of our time and to course correct on what we invest in transportation infrastructure are compelling reasons enough for a full EIS on the Rose Quarter project.

Verde joins many other Portlanders and Oregonians in raising concerns about this project. The best way to address these concerns is the completion of a full environmental impact statement that includes congestion pricing as a part of both the base case and as an alternative to widening the freeway. We also remain concerned about the financial impact of this project, and the need to right-size expansion to ensure that our state transportation finances align with the many other regional projects moving forward.

Sincerely,

Vivian Satterfield  
Director of Strategic Partnerships