



March 29, 2019

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

Dear Ms. Channell:

I'm writing to on behalf of The Street Trust to provide comment on the I-5 Rose Quarter Environmental Assessment (EA) and to request ODOT undertake an Environmental Impact Statement (EIS) so that project impacts and mitigation can be better developed and understood by the public.

The City of Portland adopted the I-5 Broadway Weidler Facility Plan in 2012 following a two-year planning process. The plan called for:

- Adding auxiliary lanes and full-width shoulders (within existing right-of-way) to reduce dangerous traffic weaves and allow disabled vehicles to move out of traffic lanes.
- Rebuilding structures at Broadway, Weidler, Vancouver and Williams and adding a lid over the freeway that will simplify construction, increase development potential and improve the urban environment.
- Moving the I-5 southbound on-ramp to Weidler to improve circulation and safety
- Improving conditions for pedestrian and bicycle travel by adding new connections over the freeway and safety pedestrian and bicycle facilities in the interchange area.

The EA indicates that the proposed project fails to achieve the objective of the Plan. In particular:

- Proposed lids are poorly conceived. There is no evidence they will increase development or improve the urban environment.

- The move of the Weidler on-ramp will not improve circulation and safety. The EA documents that project will degrade travel times for transit.
- The EA indicates no improvement in conditions or safety for bicycles and pedestrians, even though existing conditions are, in fact, quite poor. ODOT should undertake a design effort targeted to achieve meaningful benefits for bikes and pedestrians. The bike and pedestrian facilities in the EA are only conceptual. Without an explicit commitment to improvements for these modes, they may get worse, rather than better, as the design process continues.

The Street Trust is alarmed by the likely impact on walking, biking and transit during the construction period and the lack of information in the EA about how this will be mitigated. To achieve state, regional and local goals for reducing drive-alone trips, we need to significantly increase use of walking, biking and transit. Extraordinary efforts will need to be taken to mitigate the huge disruption that will be caused by the construction of the project in an area that sees 8,000 cyclists per day and is the primary portal between downtown and North and Northeast Portland. A five-year setback is not an acceptable outcome for our climate change and growth management goals nor is it acceptable to the individuals who will be impacted.

ODOT should also undertake an EIS to address the concern and opportunity presented by the Albina Vision Plan and the project impacts on children attending Harriet Tubman Middle School. The project could contribute to redress of the negative impact of transportation facilities on people of color. The EA fails to properly address these impacts and present acceptable mitigation strategies.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "J. Detweiler". The signature is written in a cursive, flowing style.

Jillian Detweiler
Executive Director
The Street Trust
618 NW Glisan, Suite 401
Portland, OR 97209