

January 4, 2023

Kris Strickler, ODOT Director
c/o I-5 Rose Quarter Improvement Project
888 SW 5th Ave.
Suite 600
Portland, OR 97204

Re: I-5 Rose Quarter Improvement Project Supplemental EA Public Comment Period

Dear Director Strickler,

Thank you for the opportunity to participate in the I-5 Rose Quarter Project Supplemental Environmental Assessment (SEA) public comment period as a participating agency. This project has the potential to remedy past harms, create an environment that supports community redevelopment, and provide benefits for people walking, biking, and taking transit in parallel with the freeway improvements. But I want to underscore the importance of our collaboration going forward. We must work together to ensure community commitments are upheld and stakeholder voices are heard. We must work together to recognize, address, and prevent repetition of the injustices suffered by communities of color throughout Portland's history. And we must work together to achieve the technical design refinements that are required for this project to succeed.

ODOT completed analysis of the Revised Build Alternative based on a preliminary design of the Hybrid 3 concept. Per the Governor's January 2022 Letter of Agreement, the City has identified the need for additional technical exploration as the preliminary design, which was developed prior to our re-engagement on the project, does not yet meet the conditions of agreement. This includes but is not limited to additional technical analysis on local street circulation impacts and possible need for modification. The topics below highlight general areas of concern further elaborated through our detailed comments attached to this letter:

- Revisions to the project are needed for alignment with city policy as it relates to prioritizing people walking, rolling, bicycling, and taking transit. Examples include but are not limited to PedPDX, the TSP and the 2035 Comprehensive plan. The project must result in a safe, comfortable, and complete network for those walking, rolling, and bicycling.
- Lack of clarity in how commitments made as part of the Independent Highway Cover Assessment are provided for. Specifically, how the design will accommodate the community vision to develop a highway cover that can be catalytic in the restoration of high-quality land and provide opportunities for community wealth for generations to come.
- The project must provide construction mitigations that ensure pedestrian and bicyclist safety with clear wayfinding, safe and efficient event area access and circulation, and that reduces climate impacts via chosen materials and methods.

- Traffic analysis needs to be completed that reflects that the project area is designated as a Multimodal Mixed-Use Area, which provides flexibility for determining significant effects of land use actions, by lifting mobility standard requirements at ODOT facilities while still applying transportation standards such as safety and multimodal access. Additionally, traffic design must consider the impact of pricing on I-5 and the potential for the planned Regional Mobility Pricing Program to change or lower vehicle travel demand in the area.
- The project must develop traffic management that provides safe and efficient movement of freight and event district traffic management, including safe and cohesive local and regional access and circulation for all modes.

Letters from various city advisory committees, including the Bicycle Advisory Committee, Pedestrian Advisory Committee, Portland Freight Committee, the Design Commission and Historic Landmarks Commission are attached to this City of Portland SEA comment letter. Many perspectives from these committees are reflected in the city SEA comment log. The letters represent additional stakeholder concerns related to pedestrian and bicycle safety and comfort, transit access and performance, freight mobility, and greenhouse gases.

We must work together to honor the community's vision for development of a highway cover that creates a network of places that support both Black and other Portlanders. To do so, and as stated in the Independent Cover Assessment, this requires a fundamental shift in design approach from an auto-focused street network and circulation system to a pedestrian-oriented street scale that improves pedestrian safety and experience and supports place-making and wealth-creation outcomes. Our ongoing collaboration to address the technical conditions during the future design phase, in consideration of the comments received during the SEA public comment period, must also continue to reflect this shift. To achieve this, we expect that extensive ongoing engagement with the City and project committees as well as with Metro, Multnomah County, TriMet, Portland Streetcar, local businesses, and stakeholders including the Albina Vision Trust and Rip City Management, and the public, will be required to inform design refinement and the many tradeoffs that must be considered and ultimately agreed upon.

Based on the Governor's letter of agreement and as part of our future work together, we look forward to continuing to collaborate to refine the design as it relates to local circulation and access; signal phasing and timing throughout the affected street network area; pedestrian, bicycle and public transit facilities and operations through the Rose Quarter area; and Rose Quarter event access and traffic management. Final design elements involving the local street network and any modifications of the state's system that impacts city facilities will require city review and approval as part of the local permitting process.

We are eager to advance our partnership to collaboratively develop the project and bring new community connections that support economic growth and an opportunity to support the community vision for the Historic Lower Albina neighborhood.

Sincerely,

Chris Warner
Director, Portland Bureau of Transportation

Cc:
Keith Lynch, Oregon Division Administrator, Federal Highway Administration

Attached:
City of Portland SEA Comment Log
Pedestrian Advisory Committee Letter
Bicycle Advisory Committee Letter
Portland Freight Committee Letter
Historic Landmarks Commission & City of Portland Design Commission joint Letter