

March 29, 2019

Ms. Megan Channell,  
Major Projects Manager Oregon Dept. of Transportation

Ms. Emily Cline, Acting Environmental Manager  
Federal Highway Administration 530 Center Street NE



RE: Albina Vision Trust Comments to Rose Quarter  
Expansion Project Environmental Assessment dated  
February 15, 2019

Dear Ms. Channell and Ms. Cline:

On behalf of the Board of Directors of the Albina Vision Trust, thank you for the opportunity to comment on the draft Environmental Assessment (EA) regarding the proposed Rose Quarter Improvement Project. Please note that the neighborhood identified in the EA as the Rose Quarter is, in fact, lower Albina; thus we refer to it as such in this letter.

We understand that financial analysts, environmental advocates, engineers, educators, multi-modal transportation experts, transportation strategists and many community-based organizations have already commented on strategic and technical aspects of the Environmental Assessment—therefore, we will not repeat those comments. Instead, we hope to draw your attention to a few other issues that are not adequately addressed in either the Environmental Assessment or the related draft designs.

We have appreciated your willingness to engage in substantive discussions with us over the last several years. The Albina Vision Trust (AVT) supports a project in the Rose Quarter/Lower Albina that works best for the people who live in our community, not just the traffic on the highways transecting our home. With this in mind, we have concluded that the current Rose Quarter Improvement Project (RQIP) Environmental Assessment does not adequately address environmental impacts, including community, social and economic outcomes. Due to these deficiencies, AVT formally requests the Oregon Department of Transportation conduct a comprehensive Environmental Impact Statement to provide better design, remediation and mitigation alternatives. We provide the following support for our position.

#### **Highway Covers Should Have Coherent Street-Level Design and Utility.**

The EA states, "... this highway cover would provide additional surface area above I-5. The highway cover would provide an opportunity for public space and a new connection across I-5 for all modes of travel" (EA Section 2.2.2: Highway Covers, p. 9).

We agree.

However, we have two issues with the design and utility of the highway covers set out in the EA. First, unprogrammed open space atop a freeway is a bad idea. The Albina Vision includes a large, public park and plazas nearby on the east bank of the Willamette River immediately west of the RQIP. Therefore, there is no need for small, unused spaces on top of I-5. Second, the current design does not optimize the street-level experience and safety for pedestrians and bicyclists. The configuration and geometry of the covers are designed for the freeway below rather than the grid of the city at the street-level. As currently conceived, the covers are an engineering and structural solution that ignores the connective urban streetscape and modern, open space principles. The resulting public spaces consist of odd remnants that are surrounded by swirling traffic and infrastructure. Without a role in the urban fabric that is clearly defined, these spaces are likely to be under-utilized.

The RQIP is a once-in-a-generation opportunity to build over the divisive, trenched highway and re-connect inner east Portland neighborhoods to the Willamette River. Let's take the opportunity to fix the problem that was created when I-5 was originally constructed.

We have made this suggestion before to ODOT staff, and we make it again in this comment letter: AVT stands ready to work with ODOT and the FHA make appropriate revisions to the RQIP to achieve coherent street-level design and utility.

### **Buildable Highway Covers Are Necessary.**

Buildable highway covers are necessary to restore the streetscape in lower Albina. The original construction of I-5 bulldozed hundreds of homes, and five decades later, nearly 90 acres of land remain under-developed in the central city. The original homes in lower Albina were never replaced. The impact on the Albina community, its neighborhood centers, its churches and schools, was never mitigated. Buildable highway covers are a critical environmental remediation for the proposed RQIP of today and the original I-5 construction of the 1950s.

The structure of the caps as currently designed, with a 300 pound-per-square-foot live load capacity, is sufficient to carry two-story buildings. With design adjustments, the caps have the potential to carry much more. AVT would support a RQIP with highway covers engineered to be capable of bearing 6 story buildings that could be used for affordable residential and commercial spaces to ease the transition between lower Albina and the Lloyd Commercial District immediately to the east of the RQIP.

We have made this suggestion before, and we make it again in this comment letter: AVT stands ready to work with ODOT and the FHA to make the appropriate revisions to the RQIP to enable multistory construction on the highway covers.

### **Place, History and Social Justice Matter: We Want ODOT and the FHA to Fix the Inadequate Environmental Assessment of Both the Original I-5 Construction and the Proposed RQIP.**

The EA refers frequently to environmental injustice, gentrification, the displacement of the historic African-American community and the general history of lower Albina and the Rose Quarter, specifically with regard to the original construction of I-5. There is no debate—the placement and original construction of I-5 contributed to the complete destruction of the community that called lower Albina home. While we appreciate the sober retelling of that awful history, *the recitation of the devastating impact on what was a largely African-American community is not remediation.*

The EA summarizes outreach efforts, particularly in African-American communities. It certainly helps to engage with the communities most affected by large infrastructure projects, especially folks who will live with the RQIP. But *outreach is also not remediation.*

The EA gives lip service to the cumulative impacts of the original construction of I-5 and the RQIP, particularly for the historic African-American community of lower Albina. However, much like historical recitation and outreach, *the mere recitation of cumulative impact is not remediation.*

The EA touches on the adverse socioeconomic consequence of the original I-5 trench as an east-west barrier in lower Albina. However, ODOT punts on taking responsibility for this environmental impact by stating that the subsequent RQIP would not “meaningfully alter the cumulative socioeconomic effects of past, present and reasonably foreseeable future actions” (Section 3.13: Socioeconomics, p. 63). ODOT is merely acquiescing in the harsh consequences of building an interstate highway through a community in the first place. ODOT offers the prospect of relatively short-term construction opportunities in the RQIP as a mitigating strategy. Contracting with qualified and diverse partners is routine business, not remediation. Furthermore, we estimate that the resulting loss of wealth transfer by former residents of lower Albina due to the original construction of I-5 was in the hundreds of millions of dollars. ODOT fails to adequately address the socioeconomic impacts of the original I-5 construction and proposed RQIP. *Passing consideration of this staggering loss of wealth, with a paper promise of SDBE contracting, is not remediation.*

Only remediation is remediation.

It is not enough to listen to community concerns and document them. You need to take action that responds to what you heard. We understand that ODOT cannot completely undo the environmental impacts of the original I-5 construction; however, AVT believes the current RQIP is an opportunity to take a different approach.

It has been explained that ODOT's work is preliminary, pending urban design this spring. We are asked to trust that the highway covers and the environmental remediation will be modified in ways that will be acceptable. But there is no basis for trust, certainly not from the historic community that called lower Albina home. It would be more reassuring to see a robust environmental impact evaluation, improved design evaluation and greater clarity about utility and purpose for the RQIP in this phase of work.

It is AVT's position that the RQIP EA does not adequately address environmental impacts, including community, social and economic outcomes. Due to these deficiencies, the AVT is formally requesting ODOT conduct a full Environmental Impact Statement (EIS), which is more comprehensive than the current EA to provide a better design, remediation and mitigation alternatives. Our request for an EIS is not a veiled delay tactic. On the contrary, we believe that a properly designed RQIP with full consideration of the issues raised in this letter and in our previous discussions with ODOT will lead to a better project and earn broader endorsement and community support.

We appreciate the many years of work that have gone into this project and the careful consideration ODOT has given to facilitate traffic movement. We would like to continue the dialogue before you move to the next phase of the project. Thank you for considering our comments.

Sincerely,



Rukaiyah Adams, AVT Board Chair

cc Via Electronic Mail:

Mayor Ted Wheeler  
Portland City Commissioner Chloe Eudaly  
Portland City Commissioner Nick Fish  
Portland City Commissioner Jo Ann Hardesty  
Portland City Commissioner Amanda Fritz  
Senator Lew Frederick  
Representative Tawna D. Sanchez  
Lynn Peterson, Metro Council President  
Sam Chase, Metro Councilor  
Juan Carlos Gonzalez, Metro Councilor  
Craig Dirksen, Metro Councilor  
Bob Stacey, Metro Councilor  
Christine Lewis, Metro Councilor  
Shirley Craddick, Metro Councilor  
Senator Ron Wyden  
Senator Jeff Merkley  
Congressman Earl Blumenauer  
Congressman Peter DeFazio  
Brendan Finn, Transportation Policy Advisor Office of Governor Kate Brown  
Rita Moore, Board of Education, Portland Public Schools, Board Chair  
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Scott Bailey, Board of Education, Portland Public Schools  
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Mike Rosen, Board of Education, Portland Public Schools  
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Natasha Butler, Harriet Tubman Middle School, Principal  
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Carl Talton, Black Investment Corporation for Economic Progress (BICEP), President  
Jeana Woolley, Black Investment Corporation for Economic Progress (BICEP), Secretary  
Nkenge Harmon Johnson, Urban League of Portland, CEO & President  
Ron Herndon, Albina Head Start, Executive Director  
Maxine Fitzpatrick, PCRI, Executive Director  
Tony Hopson, Self Enhancement, Inc., CEO  
Joy Alise Davis, Portland African American Leadership Forum, Executive Director  
Marcus Mundy, Coalition of Communities of Color, Executive Director  
Joyce Harris, Education Northwest, Manager of Community Outreach  
Nate McCoy, National Association of Minority Contractors, Executive Director  
John Washington, Soul District Business Association, President and Board Chair  
Jillian Detweiler, The Street Trust, Executive Director  
Cassie Cohen, Portland Harbor Community Coalition, Coordinator  
Donovan M. Smith, Portland Harbor Community Coalition, Media Coordinator  
Jessica Thompson, Oregon Walks, Executive Director  
Ruth Shelly, The Children's Museum, Executive Director  
Randy Gragg, Portland Parks Foundation, Executive Director  
Irene Marion, Portland Bureau of Transportation, Equity & Inclusion Manager  
Irene Appel, Portland Contractors -- Portland Business Development Group