PORTLAND PUBLIC SCHOOLS

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Date: **March 22, 2019**

To: Oregon Department of Transportation

From:

Subject: I-5 Rose Quarter Improvement Project Environmental Assessment

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Portland Public Schools (PPS) appreciates the Oregon Department of Transportation's (ODOT) and the Portland Bureau of Transportation public involvement, planning, and design efforts to improve public safety and enhance pedestrian/bicycle mobility in the I-5 Rose Quarter area. PPS also appreciates the opportunity to review and comment on the I-5 Rose Quarter Improvement Project Environmental Assessment (EA) published on February 15, 2019.

PPS owns and operates two properties within the study area of the EA. These properties will be impacted by the proposed "Build Alternative" identified in the EA. Harriet Tubman Middle School (Tubman) located at 2231 N. Flint Ave. is located directly adjacent to the I-5 right of way. The immediate adjacency of this site to the proposed project presents significant risk for the school to have short and long term impacts from the proposed project. The location and scope of the proposed improvements and presence of a young vulnerable population, require that the highest standard of care be applied to the consideration of the proposal. Additionally, the Blanchard Education Services Center (BESC) located at 501 N. Dixon St. potentially could also experience impacts from changes to local street patterns adjacent to the site.

The EA, issued by ODOT, is a dense document complete with technical data, definitive and assumed conclusions, dozens of supporting technical and reference documents, and a broad range of acknowledged impacts ranging from aquatic biology to environmental justice and socioeconomics.

PPS has completed an initial review of the EA, however the limited time provided to review this comprehensive document (approximately 6 weeks), has not afforded PPS time to complete an in-depth review and analysis supported by outside consultants or experts. Even though PPS's initial review is only cursory, a number of potential significant short and long term impacts have been identified. Additional time and information will be necessary to compile a more thorough list of concerns. Below is a preliminary list:

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- Air Quality. The SW corner of Tubman is currently located only a little over 50 feet from the closest north-bound lane of I-5. This project will reduce that distance to less than 30 feet. On the north side of the school, students spend time outside before, during, and after normal school hours. Many assumptions have gone into estimating the impact of this project on future automobile emissions. In addition, great weight appears to have been given to projections of future automobile emissions, including the basic assumption that expanding I-5 will result in a long-term decrease in congestion that is not universally accepted by knowledgeable critics. Since Tubman is occupied by almost 500 young students, this complex issue demands a more thorough analysis, understanding, and description of all variables and unknowns. ODOT has yet to release the assumptions underlying the findings on air quality, making it impossible to evaluate any conclusions in the EA.
- Soil Stability. The Tubman Middle School site is known to contain poorly compacted fill materials on the site. The proposed changes are within feet of the existing Tubman school building. How will ODOT ensure the design and construction of the proposed changes will not impact PPS property or the Tubman school? How will ODOT design and construct any retaining wall elements adjacent to the site to not interfere with the timber pile and micropile foundations that are at Tubman Middle School? Have these issues even been considered in the development of the project?
- Sound Wall. ODOT is proposing a sound wall along the right-of-way adjacent to PPS property. How will ODOT ensure the design of the proposed improvements and the construction of the proposed improvements will not impact PPS property or the Tubman school? Does ODOT's proposed sound wall start at the top of the retaining wall that would be required expanding the freeway, or would the required height for a sound wall be included in the overall height of the retaining wall?
- Noise. ODOT discusses noise levels that were monitored and their predicted future levels at multiple locations along the right-of-way. However, looking into the locations and their relationships to the project site, they do not appear to provide a model that is similar to the relationship of the Tubman site and the project site. None of the locations where noise was monitored are as close the project site as Tubman is (50'), and none of the monitored sites have similar elevation profiles in relation to the project site as Tubman Middle School has. All of the monitored sites are currently buffered from the project site by distance, elevation change, or adjacent buildings, and foliage. How will ODOT design noise mitigation requirements without exact noise measurements at a school that is one of the closest, least buffered, properties adjacent to the project site?
- Construction. ODOT's proposed project area is directly adjacent to the Tubman site. ODOT's proposed design would install new travel lanes less than 30 feet from Tubman school. There are several hundred students in the Tubman site every day during the school year from August through June, How will ODOT's project plan minimize or mitigate potential impacts to the learning environment of those students over the life of the project? How does ODOT propose to construct the new lanes closer to the Tubman site? Will ODOT need to access the Tubman site to execute their project plan? What dust and noise control measures will ODOT put in place to minimize or mitigate potential impacts to the learning environment at the Tubman site?

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- Traffic. Changes to the routing of local streets during and after construction have the potential to change the level of service on local streets and intersections receiving traffic being routed from closed streets (N. Page St./N. Vancouver St. and N. Page St./N. Williams Ave.) and from the addition of new streets (Hancock/Dixon Crossing). These changes in traffic and pedestrian patterns will have both direct and indirect impacts on both Tubman and District headquarters and may increase risk of injury for students and staff.

The potential impacts of the proposed project to Harriet Tubman Middle School are particularly troubling. The Harriet Tubman Middle School opened in 1952 as Eliot Elementary School. The neighborhoods served by Tubman have traditionally been more diverse than most other schools in the District. Additionally, the Eliot and Albina neighborhoods suffered some of the most significant impacts from freeway and urban renewal projects in the latter half of the last century, from poor health outcomes from environmental hazards to gentrification and dislocation. City and state agencies are required to apply an equity lens to project planning. The historical legacy of damage to these communities demands that the proposed I-5 Rose Quarter Improvement Project receive a higher level of scrutiny to ensure the negative consequences of past projects are not repeated.

Enrollment at Tubman has traditionally been more diverse than other schools in the District. The current enrollment of 491 students is 40.5 percent African American and 14.9 percent Latinx, and 73.5 percent of the students are considered historically underserved. The District wide averages by comparison are 16.3 percent and 8.9 percent for Latinx and African American enrollment with 49 percent considered historically underserved.

The creation of Tubman Middle School in the early 1980s at the former Eliot School had historical significance, as it played a pivotal role in the struggle over school desegregation and racist busing policies in Portland during the 1960s-1980s.

Additionally, Tubman reopened as a middle school in 2018 as part of a District-wide Middle School Framework to provide District students with a more comprehensive middle school experience and better preparation for high school. The Framework is now in its second year of implementation. The long term successful implementation of this Framework depends, in part, on students being educated in a building free of concerns related to impacts from project construction and longer term impacts from ambient air quality, noise, and vibrations.

It is PPS's position that the depth, complexity and severity of potential significant short and long term negative impacts to PPS facilities, staff, students, families, and stakeholders warrants a full environmental impact statement (EIS). An EIS will provide a better understanding of the impacts of the proposal and development of potential mitigation options.

Again, PPS appreciates the opportunity to comment on Environmental Assessment for the I-5 Rose Quarter Improvement Project. Please contact me with any questions you might have.

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C: Rian Windscheimer, ODOT Region 1 Manager
Phillip Ditzler, FHWA Oregon Division Administrator
Matthew Garrett, ODOT Director
Lindsay Baker, ODOT Government Relations Manager

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March 22, 2019

RESOLUTION No. 5856

PPS Comments on the Environmental Assessment of the I-5 Broadway-Weidler Facility Plan

RECITALS

A. In 2012, the Oregon Department of Transportation (ODOT) and the City of Portland Bureau of Planning and Sustainability and the Bureau of Transportation developed the I-5 Broadway-Weidler Facility Plan in conjunction with the City's N/NE Quadrant Plan. The N/NE Quadrant Plan set goals and actions for the land use and development in north and northeast Portland, while the Broadway-Weidler Facility Plan was intended to improve safety and operations on I-5 in the vicinity of the Broadway/Weidler interchange. Key elements of the facility plan include:

1. Adding auxiliary lanes and full-width shoulders (within existing right-of-way).
2. Rebuilding structures at Broadway, Weidler, Vancouver and Williams and adding a lid over the freeway.
3. Moving the I-5 southbound on-ramp to Weidler.
4. Adding new connections over the freeway for pedestrian and bicycle travel in the interchange area.

B. In 2012, the Portland City Council and the Oregon Transportation Commission approved the Broadway-Weidler Facility Plan. The proposed plan includes substantial widening of I-5 immediately adjacent to Harriet Tubman Middle School, including extending travel lanes closer to the school and constructing new retaining walls.

C. In 2016, ODOT concluded the Broadway-Weidler Facility Plan improvements were technically feasible, and proceeded with development of an Environmental Assessment (EA). The EA is intended to evaluate the benefits and impacts within the Project Area of two alternatives: one in which the project would move forward as planned (Build Alternative), and one in which the project would not be built (No-Build Alternative).

D. The National Environmental Policy Act (NEPA) requires federal agencies to assess the environmental effects of their proposed actions prior to making decisions. Based on the EA, the following actions can occur:

a. If the agency determines that the action will not have significant environmental impacts, the agency will issue a Finding of No Significant Impact (FONSI). A FONSI is a document that presents the reasons why the agency has concluded that there are no significant environmental impacts projected to occur upon implementation of the action.

b. If the EA determines that the environmental impacts of a proposed action will be significant, an Environmental Impact Statement is prepared.

E. ODOT's EA was published on February 15, 2019. The public comment period closes April 1, 2019. ODOT is required to take into consideration public health impacts in its analysis, and to use an equity lens in its planning processes. The historical legacy from ODOT ignoring health and equity concerns voiced decades ago about building a freeway to close to a school has cost PPS millions of dollars that were used to make the air inside Tubman safe for students.

F. Although the proposed changes are immediately adjacent to PPS properties, in particular the Harriet Tubman Middle School, neither ODOT nor the City meaningfully engaged with PPS during the planning process to assess the potential impacts, either short-term or long-term, on the health of students and staff from environmental hazards or on the structural integrity of PPS facilities from incursions on PPS property during construction.

G. An initial review of the EA by PPS staff has raised substantial questions about potential impacts on PPS properties, including risks to soil stability under the Harriet Tubman Middle School site during the construction process, increased air pollution, increased noise pollution, and shifts to traffic patterns in the vicinity of both Tubman and District headquarters.

H. The materials that have been made publicly available to date, including the environmental assessments published only six weeks ago, provide insufficient evidence that the full scope of potential impacts from these projects has been adequately assessed.

RESOLUTION

1. Due to the potential significant negative short-term and long-term impacts of the proposed project to PPS property, students, staff, and stakeholders, the Board of Education (Board) believes that ODOT cannot legitimately issue a Finding of No Significant Impact (FONSI). Additional study and input is necessary to understand the extent of the impacts and develop mitigation strategies.

2. Therefore, the Board finds that a full Environmental Impact Statement for the proposed project is warranted and necessary to determine the potential impacts of the proposed I-5 construction on PPS properties, PPS students and staff, and the larger community.

3. The Board directs the Superintendent to submit the Memo: I-5 Rose Quarter Improvement Project Environmental Assessment (dated March 22, 2019) to ODOT during the EA public comment period.

Executive Summary

What is the purpose of this document?

This document discloses results of the environmental study for the Interstate 5 (I-5) Rose Quarter Improvement Project (Project). It is formally called an Environmental Assessment (EA). The EA evaluates the benefits and impacts within the Project Area of two alternatives: one in which the Project would move forward as planned (Build Alternative), and one in which the Project would not be built (No-Build Alternative). The "Project Area" represents the estimated area within which improvements associated with the Build Alternative are proposed, including where permanent modifications to adjacent parcels or construction activities may occur. Impacts are described as short-term or long-term. Short term impacts are primarily related to construction. Long term benefits or impacts are considered out to year 2045 and compare outcomes of the Project No-Build and Build Alternatives.

Information contained in this document allows the public, businesses, interest groups, and agencies at all levels of government an opportunity to better understand the Project's benefits and impacts. This information also supports transportation officials in making informed decisions about the Project that balance engineering and transportation needs with social, economic, and natural environmental factors, such as noise, air quality, and traffic patterns. This document will be formally submitted to the Federal Highway Administration, which will review it along with public comment prior to developing a decision on the Project.

What is the purpose of the Project?

The purpose of the Project is to improve the safety and operations on I-5 between Interstate 405 (I-405) and Interstate 84 (I-84), at the Broadway/Weidler interchange, and on adjacent surface streets in the vicinity of the Broadway/Weidler interchange. The Project also would support improved local connectivity and multimodal access in the vicinity of the interchange, improve multimodal connections between neighborhoods located east and west of I-5, and complement the land use, urban design, and transportation system envisioned for the planning districts of Lower Albina and Lloyd in the City of Portland's Adopted Central City 2035 N/NE Quadrant Plan.

Why is the Project needed?

The Project is needed to address the following needs:

1. **I-5 Safety:** Data from 2011 to 2015 indicate the segment of I-5 between I-405 and I-84 had the highest crash rate in Oregon, approximately 3.5 times higher than the statewide average for comparable urban interstate facilities (Oregon Department of Transportation [ODOT] 2015).
2. **I-5 Operations and Reliability:** I-5, in the vicinity of the Broadway/Weidler interchange, experiences some of the highest traffic volumes (121,400 average annual daily trips) and hours of congestion (12 hours per day) in Oregon (ODOT 2017, ODOT 2012a). Travel reliability has decreased as periods of congestion have increased from morning and afternoon peak periods to longer periods throughout

the day. This portion of I-5 is also one of the top freight bottlenecks in the nation, hindering the efficient movement of people and freight.

3. **Broadway/Weidler Interchange Operations:** The configuration of the Broadway/Weidler interchange is not standard and difficult to navigate. The high volumes of traffic in this area contribute to congestion and safety issues (for all modes) at the interchange ramps, the Broadway and Weidler overcrossings of I-5, and on local streets near the interchange.

What are the Project goals?

In addition to the purpose and need, the Project includes the following related goals:

- Enhance pedestrian and bicycle safety and mobility in the vicinity of the Broadway/Weidler interchange.
- Address congestion and improve safety for all modes on the transportation network connected to the Broadway/Weidler interchange and I-5 crossings.
- Support and integrate the following land use and urban design elements of the Adopted Central City 2035 Plan (which includes the N/NE Quadrant Plan) related to I-5 and the Broadway/Weidler interchange:
    - A diverse mix of Commercial, cultural, entertainment, industrial, recreational, and residential uses, including affordable housing
    - Infrastructure that supports economic development
    - Infrastructure for healthy, safe, and vibrant communities that respects and complements adjacent neighborhoods
    - A multimodal transportation system that addresses present and future needs, both locally and on the highway system
    - An improved local circulation system for safe access for all modes
    - Equitable access to community amenities and economic opportunities
    - Protected and enhanced cultural heritage of the area
    - Improved urban design conditions
- Improve freight reliability.
- Provide multimodal transportation facilities to support planned development in the Rose Quarter, Lower Albina, and Lloyd.
- Improve connectivity across I-5 for all modes.

Where would the Project be located?

The Project would be located along I-5 in both the northbound (NB) and southbound (SB) directions between I-405 and I-84 in Portland, Oregon, and includes the Broadway/Weidler interchange and the surrounding transportation network from approximately N/NE Hancock Street to the north, N Benton Avenue to the west, N/NE Multnomah Street to the south, and NE 2nd Avenue to the east (Figure 1-1).

What is the Project?

The Project, or Build Alternative, would include the following elements related to both the highway and local street system (see Figure 2-5):

- Construction of auxiliary lanes and full shoulders on I-5 between I-405 and I-84 in both the NB and SB directions.
- Removal of existing overcrossing structures at N/NE Weidler, N/NE Broadway, and N Williams and replacement with a single highway cover structure over I-5.
- Removal and replacement of the existing N Vancouver Avenue overcrossing structure with a second highway cover over I-5, including a new roadway crossing at N Hancock and N Dixon Streets.
- Removal of the existing overcrossing structure at N Flint Avenue.
- Relocation of the I-5 SB on-ramp at N Wheeler to N/NE Weidler at N Williams via the new Weidler/Broadway/Williams highway cover.
- Construction of a new bicycle and pedestrian bridge over I-5 at NE Clackamas Street.
- Upgrades to existing bicycle and pedestrian facilities, including a new center-median bicycle and pedestrian path on N Williams between N/NE Weidler and N/NE Broadway.

Additional information on Project alternatives considered but dismissed is provided in Appendix A.

What happens if the Project is not constructed (No-Build Alternative)?

If the Project is not constructed (i.e., the No-Build Alternative), I-5 and the Broadway/Weidler interchange, including most of the local transportation network in the Project Area, would remain in its current configuration. Improvements to I-5 that would enhance traffic flow and safety and new highway covers that would improve multimodal connections east and west of I-5 would not occur. Without the Project, congestion on I-5 and in the vicinity of the Broadway/Weidler interchange would continue to worsen and frequent crashes would continue to occur for all modes. Delays in the movement of freight on I-5 would continue to impose costs on shippers, businesses, and consumers. Traffic delay and vehicle/bicycle crashes on surface streets near the interchange would also continue to worsen.

If the Project is not constructed, the City of Portland would be unable to implement some aspects of the land use components of the Central City 2035 Plan, as adopted. Some planned re-zonings to allow higher levels of employment or population density would not be allowed. This would limit allowed development within the Lower Albina and Lloyd planning districts. Other transportation improvement projects included Metro's Regional Transportation Plan would likely be constructed. This would include the City's plans to make improvements in the N/NE Broadway and N/NE Weidler corridor from the Broadway Bridge to NE 7th Avenue to enhance safety for people walking, bicycling, and driving through the Project Area.

What aspects of the environment are analyzed in this Environmental Assessment?

This EA evaluates the potential for the Project to affect a wide variety of environmental resources consistent with the Federal Highway Administration (FHWA) Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents (FHWA 1987). The environmental topics addressed in this EA include the following:

- Air Quality
- Aquatic Biology
- Archaeology
- Climate Change
- Environmental Justice
- Hazardous Materials
- Historic Resources
- Land Use
- Noise
- Right of Way
- Section 4(f)
- Socioeconomics
- Transportation
- Utilities
- Water Resources
- Cumulative Impacts

What areas within the City of Portland were studied to assess impacts on environmental resources?

The areas within the City studied to assess environmental impacts from the Project generally include a corridor along I-5 extending south from I-405 to I-84 and the developed areas and surface streets near the Broadway/Weidler interchange. For the purposes of this EA, this area is referred to as the Area of Potential Impact (API). For most resource topics, the API is the same as the Project Area. However, for some resources (i.e., Hazardous Materials, Historic Resources) the API was expanded beyond the Project Area to include additional areas that could experience effects from the Project.

What are the Project's anticipated benefits?

The Build Alternative would provide a variety of transportation and environmental benefits, the most notable of which include the following:

- Operations (speed and travel time) on I-5 would improve in both the AM and PM commute periods.
- Conditions for pedestrians and bicyclists would be improved by increased physical separation between motorized and non-motorized users, sidewalk gap closures, and reduction in the complexity of intersections along N/NE Broadway, N/NE Weidler, N Wheeler, N Williams, N Vancouver, and the new Hancock-Dixon connection.
- The Clackamas bicycle and pedestrian bridge would establish a new connection for people walking and biking not otherwise offered by the street system.
- Multimodal benefits would include improved access to transit, improved mobility

and safety for people walking and biking, and transit riders, and improved physical connections to areas east and west of I-5 provided by the new highway covers and the Clackamas bicycle/pedestrian overcrossing.

- The Build Alternative would include improved sidewalks, add safe bicycle lanes and additional Americans with Disabilities Act–compliant street crossings, and provide safer ingress and egress to commercial properties.
- Police, fire, and emergency responders would experience beneficial effects from reduced delays and crashes on I-5 and in the Broadway/Weidler interchange area.
- Safety improvements and reductions in congestion and delays on I-5 would have beneficial effects on the regional economy by improving the movement of goods and people.
- Improved traffic operations on the local street system and the addition of new pedestrian and bicycle enhancements would provide benefits to the local business environment.
- New highway covers over I-5 and the Clackamas bicycle/pedestrian overcrossing would enhance east-west connectivity and improve overall community cohesion within the Project Area.
- Stormwater runoff (that is currently untreated) from impervious areas both within and outside the Build Alternative's contributing impervious area would be treated prior to discharge to the Willamette River.
- Completing the Build Alternative would fulfill the City's obligation to ensure that the City's transportation plan is compatible with the Central City 2035 Plan and consistent with Oregon's Administrative Rule 660-012-0015(b).

What are the Project's anticipated adverse impacts and what would be done to mitigate these impacts?

ODOT and its partners at the City of Portland and FHWA have worked together to develop the current design concept for the Build Alternative with the objective to avoid and minimize impacts to the natural and human environment to the greatest extent possible. As a result, adverse environmental impacts from the Build Alternative would primarily result from construction activities and would therefore be short term.

The most likely impacts include the following:

- Short-term air quality impacts during construction would include the release of fugitive dust generated by soil excavation, surface grading, hauling, and various other construction activities, as well as exhaust emissions from construction equipment. ODOT would require construction contractors to implement a variety of mitigation measures to control dust and exhaust emissions from construction equipment and vehicles.
- During construction, nine historic properties could be affected by noise and vibration, increased truck traffic, traffic congestion, changes to access, increased dust, and temporary changes to the historic setting due to the presence of construction equipment, staging areas, and materials storage areas. ODOT would require construction contractors to follow a variety of best management practices to minimize these types of impacts. ODOT and FHWA have also developed a Programmatic Agreement (PA) in consultation with the Oregon State

Historic Preservation Office (SHPO) to avoid and/or minimize the potential for Project-related vibration to historic properties.

- During construction, there would be the potential for spills or releases of oil and fuel from mechanical equipment, including the mobilization or release of existing contamination in soil and groundwater. Such spills or releases could potentially increase human health and safety hazards for construction workers and the general public. ODOT would require the construction contractor to implement a range of measures to address hazardous materials concerns, including testing procedures for identifying the presence of lead-based paint and asbestos; requirements for the safe transport, use, and storage of hazardous materials; and the obligation to develop a Health and Safety Plan, a Project-specific Pollution Control Plan, and a Contaminated Media Management Plan.
- Construction activities would result in short-term noise levels in the range of 70 to 100 A weighted decibel at a distance of 50 feet. ODOT would require the construction contractor to implement noise abatement measures to minimize the adverse effects of construction activity. No substantial operations-related noise impacts are anticipated; however, ODOT propses to construct two noise walls to mitigate operational noise for receptors located in residential areas, parks, and a school.
- Short-term construction-related impacts to transit would include temporary bus stop closures or relocations, bus route detours, and changes to streetcar operations. To address short-term impacts during construction, TriMet has indicated that it may consider implementing bus route detours around the impacted area for the duration of the construction period to avoid multiple temporary changes for a single bus route.
- Construction would result in short-term impacts to highway traffic, local street motor vehicle traffic, bicyclists, pedestrians, transit, and event access at Moda Center and the Oregon Convention Center. ODOT would coordinate with the Moda Center, City of Portland, and Oregon Convention Center to avoid traffic disruptions during major events to the extent practicable.
- Highway lane closures are likely on I-5 during removal and construction of the overcrossing structures and retaining walls, including potential late night and weekend closure of all directional lanes. ODOT would develop a comprehensive transportation management plan that documents construction staging and schedule, alternate routes for all modes of travel during road closure, and lane closure restrictions as well as transportation management and operation strategies. Temporary local street closures or turn restrictions would be implemented as necessary to limit traffic diversion onto local streets in residential neighborhoods.
- Existing above- and below-ground utilities would likely be impacted during construction, with effects ranging from brief temporary service interruptions to major relocations of electric transmission and distribution lines, water supply lines, and large capacity sewer lines. Coordination with utility providers and the use of standard construction procedures and techniques would minimize disturbance to system users and avoid damage or impacts to existing utilities.
- Previously undiscovered archaeological resources could be altered, damaged, or destroyed by the operation of heavy equipment or during compaction, excavation, or grading of soils during construction and subsurface maintenance activities. Potential impacts to archaeological resources during construction would be addressed through an Inadvertent Discovery Plan and a Project-specific PA between FHWA, Oregon SHPO, and ODOT that would identify mandatory

protocols to be followed in the event of an inadvertent discovery.

- In-water construction activities could result in short-term impacts to protected fish and California sea lions from increased turbidity and underwater noise. In-water construction activities would be restricted to an in-water work window to avoid peak timing of species presence within proposed work areas. The Project would also include provisions to protect adult and juvenile fish species including a Federal-Aid Highway Program PA to address potential water quality and aquatic wildlife issues.

More detailed analysis of resources can be found in technical reports located in Appendix B. A summary of mitigation measures that would be implemented to ensure that construction and operation of the Build Alternative would not result in substantial impacts to the natural and human environment is provided in Appendix F.

What are the Project's anticipated right of way needs?

Right of way (ROW) needs to construct various Project features along I-5, including several new or reconfigured on- and off-ramps and surface street improvements, would displace and relocate four commercial retail or service-related businesses, three landlord-operated apartment businesses, and four outdoor advertising signs. All ROW acquisition and relocation activities would be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (49 Code of Federal Regulations 24), Oregon Revised Statute 35, and the ODOT Right of Way Manual (2016).

Where can you find more detailed information about Project impacts?

Additional information on the impacts and mitigation measures associated with the Project, beyond those provided in this EA, can be found in separate environmental technical reports available in Appendix B and on the Project website at: http://i5rosequarter.org/news-library/.

How has the public been involved in this Project?

Since its inception in 2010, the Project has included an active public involvement component. Early planning efforts for the N/NE Quadrant (as part of the Adopted Central City 2035 Plan) and I-5 Broadway/Weidler Plans were guided by the unique collaborative partnership between ODOT and the City of Portland, and a 30-person Stakeholder Advisory Committee. This partnership allowed for joint planning and decision-making to develop a design concept for the I-5 Broadway/Weidler interchange that would complement the land use, urban design, and transportation system envisioned for the planning districts of Lower Albina and Lloyd.

An Open House was held in the early stages of the environmental review phase (September 2017). The event, hosted by ODOT and the City of Portland, provided an opportunity for the public to learn about the Build Alternative, talk to Project team members, and share input. The Open House was attended by about 80 participants. A second Open House will be held following the release of the public review Draft EA. In

addition to the Open Houses, numerous targeted outreach events were held. A list of these events is provided in Appendix E.

How has the Project addressed the history of environmental justice in the Project Area?

Early recognition of environmental justice issues in the Project Area also led to substantial targeted outreach to raise awareness about the Build Alternative and the environmental studies underway. Early in the Project, ODOT conducted interviews with 17 members and leaders of the Black community to better understand perception of ODOT, local agencies, and the Project. Their feedback helped inform engagement activities and approach to public involvement for the Build Alternative.

To further guide and inform locally relevant outreach efforts and activities to reach the local Black community, the Project team assembled a 14-member Community Liaisons Group. This group, which includes interests and leadership for people of color, low-income, and elderly populations, met four times between September 2017 and November 2018. Community liaisons provided guidance on outreach opportunities and Project information materials.

The Project team also held several large events in the Project Area, including an open house at Matt Dishman Community Center attended by about 80 participants and a Community and Neighborhood Forum at Billy Webb Elks Lodge attended by more than 90 participants. During these events, environmental justice issues were one focal point of discussions. Concerns frequently expressed included economic opportunity, gentrification, historical injustice with past developments in the area (including I-5), distrust of agencies from past actions or perceived broken promises with development initiatives, and government services. These events, along with other public participation efforts, helped identify specific activities to engage community members—particularly those from the Black community—and will continue into the future. Between January 2017 and the time of this publication, over 50 community and stakeholder presentations were made to inform the public about the Project and obtain public input.

What agencies and organizations did ODOT consult with during preparation of the Environmental Assessment?

ODOT has worked closely with the City of Portland, and FHWA to ensure that community concerns and potential environmental impacts from the Build Alterative have been fully addressed and disclosed. ODOT would continue to work with these partners to ensure that mitigation measures and environmental commitments are implemented during construction and operation of the Build Alternative. In addition to the agencies listed above, the parties listed below were invited to participate in the Project. Some agencies invited declined to participate, as indicated.

- Metro
- TriMet
- Portland Streetcar

- National Marine Fisheries Service
- United States Army Corps of Engineers
- United States Fish and Wildlife Service (declined)
- United States Coast Guard
- Oregon State Office of Historic Preservation
- Oregon Department of Environmental Quality (declined)
- Confederated Tribes of the Grand Ronde
- Confederated Tribes of Siletz
- Confederated Tribes of the Warm Springs
- Cowlitz Indian Tribe
- Multnomah County (declined)
- Portland Parks and Recreation (declined)

Cooperating and participating agencies provided the following support to the Project:

- Reviewed and commented on the purpose and need and range of alternatives
- Reviewed and commented on methodologies used to address technical topics consistent with special expertise or jurisdiction of the agency
- Identified issues of concern regarding the Project's potential environmental or socioeconomic impacts
- Provided timely input on unresolved issues
- Invited to provide comment on this EA

Where can I find more information about the Project?

ODOT has created a Project website (http://i5rosequarter.org/) that includes detailed information on the Build Alternative, including interactive graphics and links to newsletters, maps, and other relevant documents. Interested parties can sign up for email updates and view a calendar of upcoming events at: http://i5rosequarter.org/get-involved/.

How can I submit comments on the Environmental Assessment?

Comments on the EA may be submitted in a variety of ways:

1. **In-Person Open House:** ODOT will be holding an open house in March 7, 2019 to share information and answer questions about this EA. The Open House will provide an opportunity to submit written comments.
2. **Public Hearing:** ODOT will be holding a public hearing in March 12, 2019 to provide an opportunity for the public to provide oral testimony on the Project.
3. **Online Open House/Project Website:** The same material provided at the Open House will be available online at the Project's website (www.i5RoseQuarter.org). The public may comment on the Project via this webpage.

4. **Email:** Comments may be submitted via email to: info@i5RoseQuarter.org
5. **Phone:** The public may leave recorded verbal comments at (503) 423-3760.
6. **Mail:** Written public comments may be mailed to:

   Megan Channell
   Major Projects Manager
   Oregon Department of Transportation
   123 NW Flanders Street
   Portland, OR 97209

ABOUT THE ENVIRONMENTAL STUDY PROCESS

I-5 ROSE QUARTER
IMPROVEMENT PROJECT

The I-5 Rose Quarter Improvement Project is currently in an environmental study stage. The study aims to fully understand the benefits and impacts of proposed changes to local streets near the Broadway-Weidler interchange and to I-5 between I-84 and I-405 in Portland.

The project includes:

- Highway Covers
- New Bike & Pedestrian Crossing over I-5
- Local Street, Bicycle & Pedestrian Improvements
- New Hancock-Dixon Connection over I-5
- I-5 Southbound On-Ramp Relocation
- Ramp-to-Ramp (Auxiliary) Lanes
- Highway Shoulders

When completed, the project will reduce frequent crashes, improve travel reliability and improve community connections. Community engagement has been a big component of this project's development and is important in reviewing the environmental study.

ENVIRONMENTAL ASSESSMENT REVIEW AND COMMENT PERIOD

The environmental findings will be published in the project's Environmental Assessment on February 15, 2019, followed by a 45-day public comment period (February 15 - April 1, 2019 at 5 pm). The EA is a thorough, reader-friendly report of the benefits and impacts of the project on these topic areas:

- Transportation
- Air Quality
- Noise
- Climate Change
- Environmental Justice
- Parks - Section 4(f)
- Historic Resources - Section 106
- Archeological Resources
- Hazardous Materials
- Land Use
- Socioeconomics
- Water Resources
- Utilities
- Right of Way
- Aquatic Biology

WHAT IS A FORMAL "ENVIRONMENTAL ASSESSMENT"?

Because the I-5 Rose Quarter Improvement Project utilizes federal funding, it must follow the Federal Highway Administration's (FHWA) National Environmental Policy Act (NEPA) process. This process allows transportation officials to make project decisions that balance engineering and transportation needs with social, economic and natural environmental factors, such as noise, air quality and traffic patterns. During the process, a wide range of stakeholders, including the public, businesses, interest groups and agencies at all levels of government, provide input into project and environmental decisions.

The environmental study for the I-5 Rose Quarter Improvement Project is formally called an Environmental Assessment (EA). The intent is to ensure that the appropriate criteria and environmental factors are considered and made available for public input and comment during decision-making. The EA evaluates the benefits and impacts of two alternatives: one in which the project would move forward as planned, and one in which the project would not be built.

Once the EA is formally submitted to FHWA, they will review it along with public comment prior to developing the NEPA decision document. Following this process, technical information and public comment will inform future project design. Design would then begin in spring 2019 and construction could begin in 2023.

ABOUT THE ENVIRONMENTAL STUDY PROCESS

I-5 ROSE QUARTER
IMPROVEMENT PROJECT

WAYS TO REVIEW AND COMMENT ON THE ENVIRONMENTAL ASSESSMENT

Beginning on February 15, 2019, visit www.i5RoseQuarter.org to download and review the Environmental Assessment or view a list of locations where paper copies are available. Information is available in alternative formats upon request. The public comment period runs from February 15 - April 1, 2019 at 5 pm.

There are many ways to provide your input during the comment period:

ONLINE OPEN HOUSE OR PROJECT WEBSITE

February 15-April 1, 2019 at 5 pm
www.i5RoseQuarter.org

IN-PERSON OPEN HOUSE

March 7, 2019 from 5:30 - 8 pm
Leftbank Annex - Clubroom
101 N Weidler St. Portland, OR

PUBLIC HEARING

March 12, 2019
Oregon Convention Center
Room A108
777 NE MLK Jr Blvd, Portland, OR

- 4:30 pm - 6:00 pm - Sign up to speak
- 5:00 pm – Brief project presentation, followed by public comments

MAIL

ODOT attention Megan Channell
123 NW Flanders St.
Portland, Oregon 97209

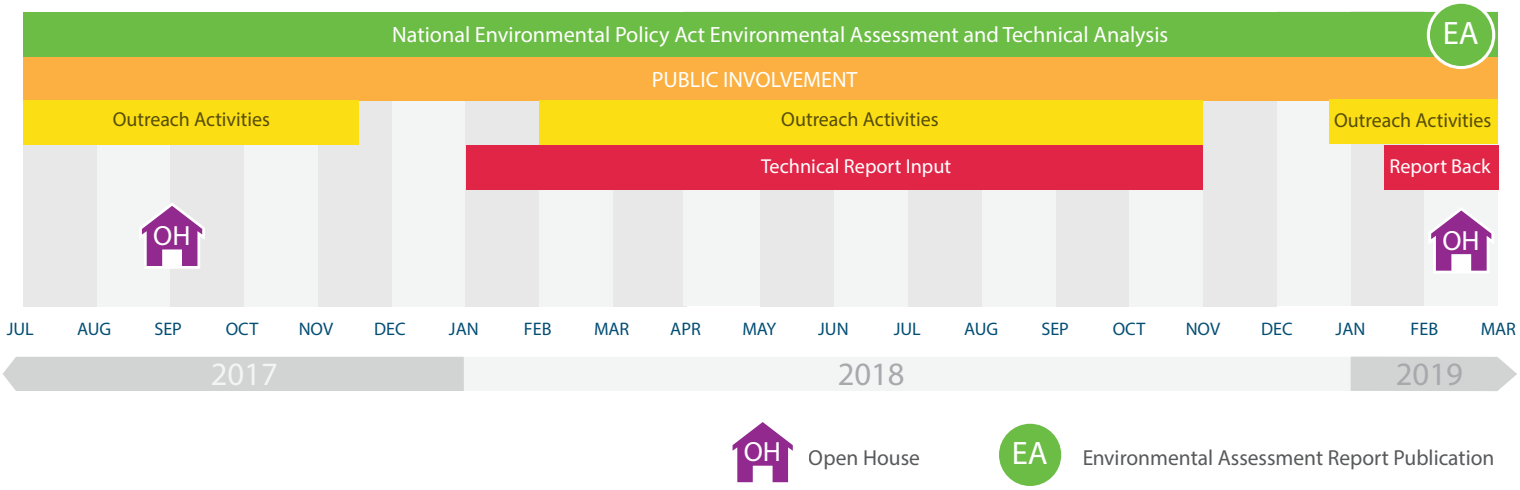
PHONE

Leave a recorded verbal comment at (503) 423-3760

EMAIL

info@i5RoseQuarter.org

ENVIRONMENTAL STUDY TIMELINE



OH Open House

EA Environmental Assessment Report Publication