From:

Eric Mandel

What do you want to tell legislators about the proposed \$1.9 Billion Rose Quarter Freeway Expansion and Oregon's transportation system?

I submitting this public comment urging my representative legislators to demand that a full Environmental Impact Statement is completed for the Rose Quarter Project. Without meaningful alternatives studied under the guidelines of the full EIS, the current analysis, and public feedback to date is worthless.

Oversight of the facts, alternatives, project, data, impacts, mitigants, cost and benefits of major capital expenditures and policy is the job of the legislators.

As intelligent elected decision makers, the Legislature body should want more information, rather than less. You should want to have choices presented to you, instead of being left out of the process as passive enablers.

A quality EIS must include:

A no build scenario (based on real current traffic analysis)

A scenario where the current footprint of the freeway is maintained (80 feet wide) and caps are built to connect the neighborhood.

Tolls must be incorporated.

Against these alternatives, the costs and benefits of the current proposed project can be measured.

I would add to that another alternative where the freeway is decommissioned and all of the land is put into a Land Trust owned by the Albina Vision for community development

The requirement of an EIS became law to elevate a scientific approach to policy and capital allocation decisions. It elevates transparency. It considers the natural environmental impacts as well as impacts to marginalized communities. It presents alternative proposed projects. It is a model for how you actually build community.

At a time when science and facts are under attack, marginalized communities are watching the progress of the past 60 years rolled back when it should be accelerating, and the natural environment is under considerable stress and about to reach a catastrophic tipping point, society has become hyper polarized where the group in power considers only one option, and government transparency is receding, it is unconscionable and indefensible that the legislatures are not requiring that the Rose Quarter project receives the due diligence as outlined in a full EIS.

The below is just one example I am sure that will be provided in public and written testimony, where ODOT has failed to provide the public, and public representatives the necessary information and analysis required for a project of this significance, as called for in a full EIS. Instead ODOT has actively worked and advised against the ideals of a full EIS, in favor of limited public discourse and expeditated project implementation.

The Historic Albina Advisor Board was asked to support the project, yet were confined to such a small boundary of influence that their contributions are completed overwhelmed by the scope and scale of the proposed freeway widening. As many providing testimony will attest, the footprint of the freeway is key to everything. The Historic Albina Advisory Board (HAAB) deliberated extensively on really only one footprint for the freeway caps. An expanded freeway right of way. No consideration was given to an alternative project of capping the existing freeway span, which would be both less expensive and provide for much greater development opportunities. They were not given the option of supporting this plan over one in which the freeway was widened.

Instead of championing this concept of better less expensive caps, ODOT dissuaded the HAAB from dreaming big – from looking to "hit a home run" and instead urged them to look for "baby steps". ODOT pushed the HAAB to support the current footprint "as fast as possible", Stressing that "I don't think it's necessary that we try to delay a project to force it to go through another environmental rigorous review." ODOT stressed the importance of "keeping in mind that we do have boundaries there's a specific footprint that has been defined under our environmental assessment approval . . . that baseline footprint which i think is the main emphasis that i want folks to kind of keep in mind um and understanding that baseline will help this group evaluate the feasibility of that cover design" These quotes are from Vice Chair Alando Simpson's speech to the HAAB on April 6th 2021. Instead of completing a full EIS with meaningful project alternatives, ODOT convinced the community to "trust the process" and that there was only one option for the freeway footprint. You see this time and time again with both the HAAB and in all community outreach. The Community should have the opportunity to study and support real alternative project options outlined in a full EIS.

I disagree with the groups urging for an Environmental Impact Statement on the basis that reducing VMT in that the Portland region will be able to make a difference to Climate Change. Portland is too small of a region to make any impact on climate change. What we do is meaningless. Fortunately, we have leaders who champion legislation and projects that are at the forefront of addressing the climate issue, that are the forefront of Smart Growth, that are at the forefront of equity and inclusion. Like stopping the Mt. Hood Freeway, decommissioning Harbor Drive and turning it into a park, reallocating transportation funding to light rail, adopting a Regional Government, adopting Urban Growth Boundaries, being a leader in single family re-zoning, being a leader in bike infrastructure. The list goes on and on of instances where the Portland region made decisions on smart growth that other municipalities across the US and around the world learned from and adopted. IN this way, the effects of Smart Growth in Portland was magnified to actually make a meaningful impact. Through being leaders in Smart Equitable Growth and fighting Climate Change with a Roes Quarter EIS, Oregon Legislators and the Portland Region can actually have a meaningful impact.

Allowing a project such as the Rose Quarter to go through with only an environmental assessment sets a dangerous precedent that can be copied by other municipalities in pushing through Highway Expansion and other massive projects. If a full EIS is not completed, the harm to historically marginalized communities, to climate change, to decisions based on science, facts, and the weighing of alternative options (good governance) will not only be negatively felt in Portland, it will have a destructive ripple effect throughout the country. If the Portland Region fails at the Rose Quarter, it is only presenting a playbook for other transportation departments and legislative bodies in Texas, South Carolina, Missouri etc. on how to bypass government transparency, public input, marginalized communities, environmental consideration, and good government principals.

Again, I think Vice Chair Alando Simpson made a similar point in how important the work of our Legislators is in directing the Rose Quarter Project:

"I do believe that there is a very important group of leaders and individuals and all different disciplines that are working collectively to ensure that what happens as a result of this project actually can foster a model for how you actually build community going forward and how that really impacts and restores some of the historical injustices wrong that impacted a particular group Portland is not the only place where highways have scarred the fabric of the community it's happened all over the entire country I mean it happens all over the world."

Ask yourself – does the requirement of an EIS better "foster a model for how you actually build community going forward?" When deliberating on that, please consider this testimony and of all those urging for the completion of an Environmental Impact Statement.

Thank you for your time and consideration.

Excerpts from Vice Chair Alando Simpson speech to HAAB on April 6th 2021 are below. Full transcript can be found in ODOT archives or you can find the recording by searching YouTube for ODOT HAAB April 6 2021.- Alando Simpson's speech starts at about minute 7:30.

"I kind of say a couple of things as it pertains to where things are at today um at our last meeting we had an update on the work of the independent highway cover and there's a lot of community feedback during that first round of workshops and um for the ica team uh really the role that they've been brought on to really assist the agency with was you know generating up to three feasible engineering and architectural options in one of our previous esc meetings i raised this question to the group because there's we can come up with all kind of pretty pictures and designs but the real question is what can we do within the boundaries that we actually have

to try to think through what you can and can't do as you're working through community engagement processes so i would just highly encourage folks that you know we obviously want to focus on the community and the economic needs for this particular area but the one thing we have to be cognizant on is keeping in mind that we do have boundaries there's a specific footprint that has been defined under our environmental assessment approval . . . that baseline footprint which i think is the main emphasis that i want folks to kind of keep in mind um and understanding that baseline will help this group evaluate the feasibility of that cover design so that we can start working towards reconnecting this community and thinking about bigger opportunities like the group that's working on more of an economic development strategy referred to as albino vision trust as it pertains to urban planning efforts and so whatever role the department can play in that effort to try to help streamline and help assist foster through a bigger economic development strategy such as one that is really large and aspirational like Albina vision trust

i don't think it's necessary that we try to delay a project to force it to go through another environmental rigorous review when we have an opportunity right in front of us and somebody can go verify this but as the team has been designated right now within the within the construction partnership on this project there is an estimated 100 million dollars that is going to go back into the hands of a black owned construction firm period now why is that important it's because it is one of the largest if not the largest

contract ever issued to a black owned civil engineering firm not on the west coast but on in our entire country that is transformational

i encourage you guys all to continue to challenge the agency push the agency demand the agency do things outside the box and different but to always keep in mind that there's boundaries in which you work through outcomes to try to get to positive solutions and so in this case we unfortunately have a boundary unless people believe it doesn't make sense to put 100 million dollars into the black community as fast as possible if people don't believe that then sure i understand but . . . "