



December 12, 2019

The Honorable Kate Brown
Governor of Oregon
Office of the Governor
900 Court St NE, Suite 254
Salem, OR 97301-4047

RE: RQIP PROCESS

Dear Governor Brown:

Over the past year, the Oregon Transportation Commission (OTC) and Oregon Department of Transportation (ODOT) have hosted a series of meetings regarding the Rose Quarter Improvement Project (RQIP) with key stakeholders including Albina Vision Trust (AVT) and Portland Public Schools (PPS). Those meetings have failed to make meaningful progress in critical infrastructure issues impacting the future livability of Oregon citizens.

We are writing to ask that you request that the OTC delay any decision regarding the RQIP at its meeting in Lebanon next week and that you reconvene the discussion early next year in Portland.

AVT and your office share a common interest in seeing a viable and fair solution that will provide lasting benefits to the community. We write this letter to ask for your personal involvement in supporting the transformative vision and realistic solutions that we have proposed. We trust that you understand the critical role that wise public investment can make in shaping a better future for Oregon families and healing some of the scars of the past.

For several years, AVT has been envisioning a new kind of community in the lower Albina area of Portland. The ground is special. It is a place where the racial inequity of urban renewal came, then came again, and again. Promises were made and broken. Black people and immigrants were displaced. Wealth was taken. The construction of Interstate 5 (I-5) was central to this unjust history and any future investment in the area should strive to repair the damage done.



Numerous community assets will be impacted by the proposed RQIP. Harriet Tubman Middle School and the many children of the future who will spend their days in lower Albina will forever be impacted by unsafe surface routes and elevated emissions. AVT advocates that future highway plans prioritize children and connect neighborhoods. If we work together with this in mind, a new kind of community will emerge – one that recognizes the past and puts all of our children at its core.

During the meetings over the past year, we have repeatedly voiced our concerns with the RQIP in plain and direct terms. Our concerns have been met with no dependable assurance that the current RQIP, and its process, will fundamentally change. If there is to be a RQIP, it is our belief that there must be substantive changes to the project and the process going forward. The proposed creation of a “special advisory committee,” with mere promises that it will be consulted about the project in the future, is not the right solution.

We believe there is a better solution. One that clearly identifies how the RQIP prioritizes children and community, not just transportation merely passing through a critical corridor. The project must outline the improvements in roadway safety and alternative transportation options, and how it will be constructed. Given the history and legacy of the area, there should be an intentional effort to support minority-owned contractors in future construction projects.

The project requires a fresh look and new approach. It is an opportunity for significant transportation investment dollars to serve as a down-payment on a comprehensive, long-range strategy to rebuild a community that values children, affordable housing, public spaces, and community wealth-building.

To embrace this approach, we ask you to take the following steps:

- Ask the OTC to delay any decision on whether the project will be subject to an environmental assessment (EA) or a full environmental impact statement (EIS).
- Appoint an individual (or several individuals), who are independent from ODOT and the OTC, to quickly (within 90 days) review the issues raised by the stakeholders and provide a report with recommendations for a path forward. Ideally this report would be completed for you and the Legislature to review during the February session. The independent assessment will provide confidence that this very large public investment will be thoughtful, innovative, and citizen focused.
- Following the independent assessment report, instruct ODOT and the stakeholders to negotiate a Memorandum of Understanding (MOU) that incorporates the



recommendations and defines a process for including stakeholders in the project's decision-making. Only after this step should the OTC make a decision on whether the project should be subjected to an EA or EIS.

We have thought about what a successful process might consider and have attached a draft of that thinking for your consideration. We hope that this can offer a starting point or framework to our work over the coming weeks. To assist in your review, we thought it would be helpful to have an unfiltered summation of our issues with the RQIP. Therefore, we have also attached our comment letter dated March 29, 2019 submitted as public comment in the RQIP.

Together, we have the opportunity to advance a new kind of transportation project – one that builds, heals, and educates a community. We look forward to working with you and your agencies to that end. Thank you for your consideration and your ongoing leadership.

Sincerely,

Rukaiyah Adams
Chair, Albina Vision Trust

Attachments: Preferred Process Outcomes Draft
Original AVT Letter to ODOT of March 29

cc: Kris Strickler, Director, Oregon Department of Transportation
Bob Van Brocklin, Chair, Oregon Transportation Commission
Guadalupe Guerrero, Superintendent, Portland Public Schools
Ted Wheeler, Mayor, City of Portland
Chloe Eudaly, Commissioner, City of Portland
Lynn Peterson, Metro Council President
Senator Lew Frederick
Representative Tawna Sanchez
Multnomah County Commissioner Susheela Jayapal



**Rose Quarter Improvement Project
Preferred Process Outcomes
December 12, 2019
DRAFT**

This summary abstracts what AVT would like to achieve for a re-imagined Rose Quarter Improvement Project (RQIP) process. The RQIP requires a fresh look and new approach so that this significant public investment can help to heal some of the scars of the past and shape a better future for Oregon families. These thoughts reflect our perspective on the on-going conversations within our community and identify an urgent need to engage other allies and stakeholders in a meaningful process about proposed outcomes. By sharing them, we aim to clarify possible outcomes of the RQIP process and encourage the interested parties to be clear about why an expanded, community-centered process is the right course going forward.

We are intently focused on this interstate transportation investment as a vehicle to help achieve social, economic, and environmental justice. We do not expect the RQIP to entirely solve the complex development problem in lower Albina; however, we do expect it to catalyze action with a necessary transportation infrastructure investment.

AVT is looking for meaningful, long-term community benefit and to help ODOT and the OTC evolve their community engagement approach and framework to suit a more diverse and equitable region. We do not desire to be transactional with ODOT and the OTC; there is no specific “deal” or “trade” that we seek. The path to a good project, begins and ends with a fair, thoughtful process. For AVT, process is substance.

The reason why we are in this mess in the first place is because there was no inclusive community process 50 years ago; and there has been no effective process for informed, interested parties in the current proposed RQIP.

The following are what we view as key components of a community-centered process.



1. SPECIFIC & ENFORCEABLE DIVERSE CONTRACTOR GOALS

ECONOMIC JUSTICE & FAIRNESS

Specific and enforceable agreements for diverse contractors, with specific targets for African-American contractors on the RQIP. We would like to see targets for businesses that are located in, and hire from, the region. The original project destroyed a community, this one must catalyze its renaissance. We believe that renaissance begins with the contracted businesses (ownership) and the labor force working on the project (family wage jobs).

2. ENGAGEMENT WITH INFORMED ALBINA COMMUNITY ACTIVISTS AND BUSINESSES

SOCIAL JUSTICE

We want meaningful community engagement with interested, informed citizens on the RQIP investment. "Meaningful" community engagement will definitely include forms of engagement other than focus groups. There are well-meaning, thoughtful folks who want to see a catalytic project. They do not want to stop infrastructure investment, they want it to lead to transformation. We also would like to consider how ODOT could demonstrate flexibility and responsiveness to information, feedback and insight gained through this meaningful engagement.

3. FRANK & HONEST ASSESSMENT

VISIBILITY, ACKNOWLEDGEMENT & ACTION FOR SOCIAL JUSTICE

This would include assessments of the financial, wealth, community and health impacts of the original I-5 construction and the proposed expansion. Cut the crap and political speak. We want to heal, and it begins with truth. Truth is not merely the recitation of racist outcomes, but also some level of taking responsibility for the original and incremental outcomes plus specific action toward remedying them.

4. LONG-TERM FINANCIAL BENEFIT TO THE HISTORIC ALBINA COMMUNITY

ECONOMIC JUSTICE

The freeway destroyed a thriving community. Our preliminary estimate is that approximately \$500 million dollars of wealth was taken from the historic community, in real estate alone. We want to imagine how the RQIP can help to rebuild the wealth lost long after the construction of the project done. We look forward to exploring land trust arrangements or other forms of community ownership of the land created by freeway caps. We would also envision establishing a set of community agreements about where proceeds from proposed tolls will actually go. We want them to benefit re-development and community building for lower Albina. AVT understands this may require collaboration with other city, state and national transportation partners.



5. INVESTMENT TO ENABLE STREET-LEVEL RATIONALIZATION, HEALTH & SAFETY

INTEGRATED URBAN DESIGN AS SOCIAL JUSTICE

Allowing surface level design centered on improving the lives of *people*, especially *children* first. We aim to rebuild lower Albina for families. People will live there. A treacherous cut through the city simply does not work – today or in the future. We understand that forward thinking about an interstate highway as a part of the urban landscape is a new idea. We also understand that putting people first will require the cooperation and support of various municipal organizations and stakeholders – the city of Portland, Metro, and Portland Public Schools, to name a few. Yes. It is true. We expect ODOT and the OTC to work with municipal stakeholders because we know it is no longer wise to regard freeways as stand-alone construction projects. Perhaps, it never was.

6. ENVIRONMENTAL VISION & LEADERSHIP

ENVIRONMENTAL JUSTICE

We want a process to come to a vision for how ODOT can help lead the way to environmental innovation in transportation infrastructure in Oregon. We can imagine electric charging stations on freeway caps, innovative multimodal last mile connections, storm water management facilities, carbon offsetting plantings, and adjacent alternative fuel facilities. We want the I-5 span in Oregon to be the greenest, and most innovative stretch of interstate highway in the nation. How will we know the ways that we could improve the environmental impact if we don't have a robust enough process to even consider it?

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
Julie Esparza Brown, Board of Education, Portland Public Schools, Board Vice Chair
Paul Anthony, Board of Education, Portland Public Schools
Amy Kohnstamm, Board of Education, Portland Public Schools
Scott Bailey, Board of Education, Portland Public Schools
Julia Brim-Edwards, Board of Education, Portland Public Schools
Mike Rosen, Board of Education, Portland Public Schools
Nick Paesler, Board of Education, Portland Public Schools
Superintendent Guadalupe Guerrero, Portland Public Schools

Natasha Butler, Harriet Tubman Middle School, Principal
Chris Oxley, Portland Trail Blazers, Senior Vice President, Venue Operations
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