



U.S. EPA, Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Nov 14, 2024

To: Susan Sturges, EPA Region 10 Transportation
Cc: Emily Bitlac, EPA Region 10 NEPA EJ Program Liaison
Ellie Walters, TRI Program, EPA Region 10
Angeles Herrera, EPA Region 10 Director of Environmental Justice, Community Health
& Environmental Review
Rebecca Chu-EPA Region 10 Environmental Justice Branch Manager
Caleb Shaffer- EPA Region 10 Portland Harbor Team Lead

Dear Ms. Sturges,

Our two collectives, Portland Harbor Community Coalition and Just Crossing Alliance, representing dozens of frontline organizations and communities, have grave concerns about the minimization of findings to address environmental justice cumulative impacts in the Interstate Bridge Replacement (IBR) Draft Supplemental Environmental Impact Statement (EIS). We are requesting that EPA region 10 trigger a more comprehensive look at cumulative impacts to environmental justice communities, not only for the IBR EIS, but also for the other major infrastructure projects scheduled to occur simultaneously (listed below).

Founded in 2012, Portland Harbor Community Coalition (PHCC) is a diverse collective, centering communities that are disproportionately impacted by exposures to toxins in decision-making actions that address harms and secure community benefits, including a safer, healthier river and riverfront for future generations. To learn more about PHCC, please visit phccoalition.org

The Just Crossing Alliance comprises 36 environmental, land use, transportation and environmental justice organizations seeking the most equitable and sustainable outcomes possible from the Interstate Bridge Replacement (IBR) project. To learn more about the Just Crossing Alliance, please visit justcrossing.org

Our organizations are aware that over the next decade or more, our regional communities will experience adverse environmental and public health impacts during many overlapping construction projects:

1. Interstate Bridge Replacement
2. Portland Harbor Superfund site cleanup
3. Rose Quarter freeway cover and expansion
4. Levee Ready Columbia project
5. Retrofitting of Critical Energy Infrastructure Hub tanks

We have reviewed the Cumulative Impacts chapter and technical report for the IBR Draft Supplemental Environmental Impact Statement (EIS) and find no mention of the cumulative impacts to people and the environment from the overlapping infrastructure projects. We believe this is a major deficiency in the EIS that must be remedied.

We also note that Metro, as one of the IBR project partners, insisted on a Health Impact Assessment (HIA) as a condition of approval for IBR's Modified Locally Preferred Alternative. We had hoped this HIA would be a component of the EIS, but the effort was started very late and the product is a less stringent Health Analysis (without a public outreach component). The Health Analysis was promised as a comment on the EIS, but with a week remaining in the comment period, has yet to be delivered. The Executive Summary for the Health Analysis, which has been released, does discuss construction impacts for IBR but makes no mention of harmful cumulative impacts with other construction efforts.

In conclusion, we request that EPA Region 10 use its authority to require a full analysis, in partnership with community groups like ours, including a formal public comment process, of the cumulative impacts on environmental justice communities due to these proposed construction projects.

Please let us know your availability to meet within two weeks of this letter submission, by email to contact@phccoalition.org and info@justcrossing.org.

Respectfully,

Portland Harbor Community Coalition & Just Crossing Alliance