



To: Interstate Bridge Replacement Program
From: Matt Tuckerbaum, Board Member, Portland: Neighbors Welcome
Aaron Brown, Board President, Portland: Neighbors Welcome
Date: 17 November 2024
Re: Comment on Draft Supplemental EIS

Portland: Neighbors Welcome is an all-volunteer pro-housing advocacy group, focused on advancing policies that will let every present and future Portlander find and keep a safe, stable home they can afford. We advocate for land use, abundant housing, and transportation policies that will make Portland a fairer and more sustainable city.

In accordance with this perspective, Portland: Neighbors Welcome is a member of the Just Crossing Alliance and firmly supports the recommendations outlined in their submitted testimony¹. We strongly urge the Interstate Bridge Project to act on the feedback provided by residents and community organizations to right-size this project and realign the design to connect and improve active and mass transit options.

We agree that this important interstate connection should be seismically resilient, but the project has strayed far beyond that remit to become a five-mile highway widening project that poses enormous risks to the Portland region's urban fabric, finances, environment, and quality of life. Specifically, the project as currently designed will:

- Supercharge auto-intensive development throughout the region
- Undermine progress towards co-locating homes, jobs, and commerce in complete communities
- Destroy existing homes and make others unbearable in the midst of a housing shortage
- Absorb financial, physical, and labor resources that would be better dedicated to new housing and active and mass transit projects
- Saddle the Portland Metro region with expensive long-term infrastructure that pollutes our neighborhoods and undermines our climate goals

This proposal is completely out of step with the way that our region operates, and it is incompatible with our collective aspirations for the kind of place we want to live in. **Spending upwards of \$7 billion to massively expand the bridge and the highways that feed it in both directions is an approach better suited for 20th century Texas than 21st century Oregon and Washington.** The IBR team must go back to the drawing board and generate a design that will (1) sustain essential interstate connectivity in the face of an earthquake, (2)

¹The Just Crossing Alliance testimony is available here:
<https://justcrossing.org/wp-content/uploads/2024/11/JCA-Overview-DSEIS-Comment-Letter.pdf>



improve active and mass transit links between Portland and Vancouver, and (3) minimize impacts on our homes, communities, and budgets.

If we were to task the IBR team with at least a moment of reflection, we would offer the following thoughts:

- **Recognize that transportation and land use are connected:** It is impossible for a road construction project to solve congestion, so the IBR project should do only what it was tasked with and let state and regional planning and transit authorities find ways to rebalance our development and transportation patterns.
- **Homes, Not Highways:** Understand the most pressing needs of our region and make them better - not worse. There is no issue more relevant than the need for more homes, so it is unacceptable for the IBR to propose destroying homes to make way for a highway expansion. *The Columbian* reported in October that the IBR proposes to bulldoze 43 homes in Vancouver to make way for additional freeway right-of-way². That practice should have been left behind long ago, and should never be entertained again, let alone in our current housing shortage.
- **Steward our scarce public resources effectively.** Right-sizing this project must consider both its physical size and the financial toll - both immediate and ongoing. This project as currently designed is completely disproportionate in scope to the need, and that mismatch is even more glaring when it is examined in relation to the other needs of the area. Pare it back and be celebrated for accomplishing what is needed as efficiently as possible.
- **Discrepancies in the traffic projection data are alarming.** Portland: Neighbors Welcome is disturbed by the findings commissioned by the Just Crossing Alliance and published in *Willamette Week* that indicate that the IBR planning team has manipulated the traffic projections used to justify this entire \$7 billion highway project³. Any decision on building infrastructure - particularly on this scale - must be based on quantitatively sound and rigorous reasoning. It is deeply concerning that a basic analysis of IBR's traffic projections reveal numerous significant inaccuracies.
- **Think about the experiences of humans who cannot or will not drive.** Placing a transit station eight stories above ground level, without any connection to active modes, with little to no separation from a highway, makes clear that this team lacks the expertise necessary to develop a critical infrastructure project in a region where at least 30% of people do not drive. Additionally, expanding the highway right up to existing buildings that house people and businesses will subject people to incredibly harmful levels of noise and pollution. Recognize the impacts of everything you propose. We support the

²"43 residential units, 33 businesses in Washington and Oregon could be hit by I-5 Bridge replacement" *The Columbian*. October 1 2024:
<https://www.columbian.com/news/2024/oct/01/43-residential-units-33-businesses-in-washington-and-oregon-could-be-hit-by-i-5-bridge-replacement/>

³"Expert Says Traffic Modeling for Interstate Bridge Replacement Is Wrong" *Willamette Week*. November 11, 2024
<https://www.wweek.com/news/2024/11/11/expert-says-traffic-modeling-for-interstate-bridge-replacement-is-wrong/>



policy recommendations put forth by the Just Crossing Alliance to improve the active and public transportation components of the project⁴.

The crossing that the IBR Program delivers will shape our region for decades to come. We need a better plan for a right-sized bridge replacement as soon as possible, so that we get the resilient crossing we need, instead of being stuck with an enormous, burdensome bridge that will exacerbate our biggest problems, while robbing Oregon and Washington of the resources we need to invest in solutions to our housing, transportation, and climate crises.

⁴ That letter is available here:

<https://justcrossing.org/wp-content/uploads/2024/11/Just-Crossing-Alliance-Active-Transportation-Vision.pdf>