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November 18, 2024

IBR Program Draft SEIS  
c/o Chris Regan  
500 Broadway Street, Suite 200  
Vancouver, WA 98660

Dear Mr. Regan and IBR Program Staff,

My name is Indi Namkoong; I am the Transportation Justice Coordinator for Verde. Verde's mission is to serve communities by building environmental wealth through social enterprise, outreach, and advocacy. We were born in 2005 in NE Portland's Cully neighborhood, a neighborhood with more than its share of poverty and less than its share of environmental assets. Cully is called home by many Black, Indigenous, and other people of color, with a highly visible Latinx population. It includes the most racially/ethnically diverse Census tract in Oregon. This is both where we do our place-based work and a symbol of the environmental justice communities we advocate for and with statewide.

The Interstate Bridge Replacement is a once-in-a-generation investment for our region. It could be an opportunity to make a downpayment on a thriving region and a more equitable transportation system, but our communities know this is far from a guarantee. A legacy of car-centric and overbuilt transportation infrastructure investments in our region has left polluted air, heat islands, unsafe streets, and scarce transit connections for neighborhoods like Cully and other communities of color, low-income communities, rural communities, and more across the state who share these challenges. Projects like this one have promised more good jobs, safer travel, and connected communities in the past, but we're not seeing them in our neighborhoods.

Oregon needs a seismically resilient I-5 bridge. We also need to ensure the largest infrastructure investment in Oregon's history does not repeat the mistakes of the past. To this end, we offer our comments on the Interstate Bridge Replacement DSEIS. These will be submitted in multiple parts, organized by topic, and in full as an attachment to the first submission.

### **Public and Active Transportation**

The inclusion of robust public and active transportation infrastructure will be critical to ensure that this project does not leave communities on both sides of the river behind. As our partners in the Just Crossing Alliance have put it, the DSEIS indicates that this project's "[mobility] benefits will flow disproportionately to white, non-Hispanic residents and the burdens of noise and tolls will be disproportionately borne by low-income and equity priority communities". Public and active transportation are some of the best tools we have to begin to correct that imbalance. Equity priority communities, including the low-income Oregonians of color that Verde serves,



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often rely more heavily on non-auto modes of transportation and often face barriers to access. Without robust, future-proofed investments in public and active transportation options, the project risks perpetuating existing disparities and providing a lackluster return on investment in the coming decades. We urge that these components be fully integrated and prioritized in the final design, in line with the Just Crossing Alliance’s Active Transportation and Transit Vision document as well as the work of the Active Transportation Working Group.

### **Equity in Tolling Policy**

We are deeply concerned that the proposed tolling policies provide no assurance that equitable pricing for low-income individuals will be in place when tolling goes into effect. Any tolling system must include discounts or other pricing policies that provide relief for low-income travelers as a baseline, not an afterthought. These policies must take effect when tolling begins, not after construction is completed. Exempting pre-construction tolling from these equity considerations would disproportionately burden communities that can least afford to pay. These policies should be guaranteed to be in place from the outset.

### **Traffic Modeling and the Marshall Report**

The findings of the Marshall Report on traffic modeling, which raises important questions about the accuracy of traffic forecasts and the assumptions driving this project, deserve a thorough review and response as part of this process. The report highlights faulty modeling in the DSEIS that overestimates traffic growth and underestimates alternative transportation options. We found it particularly concerning that the original DSEIS analysis does not account for the effects of induced demand. We believe it is essential that these concerns are fully addressed, particularly before committing to the construction of a second auxiliary lane. We urge the Program and its local and federal partners to carefully review and respond to these findings, as they may have significant implications for the proposed level of capacity and the GHG and air quality analyses “downstream” of the traffic modeling.

### **Displacement of Homes and Businesses**

We are alarmed by the potential displacement of up to 76 homes and 33 businesses within the project footprint. The displacement of residents, particularly in historically marginalized communities, could exacerbate existing inequities and disrupt lives. The project must include clear plans for minimizing displacement, providing adequate compensation, and offering relocation assistance where necessary. Special care should be taken to protect communities that have already been burdened by past infrastructure projects.

### **Absence of Health Analysis**

The delay of the Health Analysis that we’ve anticipated during this comment period has left us unable to review or respond to some of the project impacts of greatest concern to the communities Verde serves, including air and noise pollution. This analysis is essential to understanding the environmental justice implications of the project and how it contributes to cumulative public health impacts for populations living in proximity to the project area. Without



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this information, we are unable to fully assess the health risks and make informed comments. We ask that the Health Analysis be made available as soon as possible and that time is allowed for additional public comment once it is available.

In conclusion, while we believe a seismically sound, multimodal bridge replacement is needed, the Interstate Bridge Replacement project must proceed in a way that also prioritizes equity, protects vulnerable communities, and provides a comprehensive, transparent analysis of the project's impacts. We hope that these concerns are weighed seriously as the planning process moves forward.

Thank you for your consideration.

Sincerely,

**Indi Namkoong**

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