



## PORTLAND PUBLIC SCHOOLS

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**Date:** March 29, 2019

**To:** Oregon Department of Transportation

**From:** Portland Public Schools

**Subject:** I-5 Rose Quarter Improvement Project Environmental Assessment

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Portland Public Schools (PPS) appreciates the Oregon Department of Transportation's (ODOT) and the Portland Bureau of Transportation's public involvement, planning, and design efforts to improve public safety and enhance pedestrian/bicycle mobility in the I-5 Rose Quarter area. PPS also appreciates the opportunity to review and comment on the I-5 Rose Quarter Improvement Project Environmental Assessment (EA) published on February 15, 2019.

PPS owns and operates two properties within the study area of the EA. These properties will be impacted by the proposed "Build Alternative" identified in the EA. Harriet Tubman Middle School (Tubman), located at 2231 N. Flint Ave., is located directly adjacent to the I-5 right-of-way. The immediate adjacency of this site to the proposed project presents significant risk for the school to have short and long term impacts from the proposed project. The location and scope of the proposed improvements and presence of a young, vulnerable population, require that the highest standard of care be applied to the consideration of the proposal. Additionally, the district's headquarters, known as the Blanchard Education Services Center (BESC) located at 501 N. Dixon St., potentially could also experience impacts from changes to local street patterns adjacent to the site.

The EA, issued by ODOT, is a dense document complete with technical data, definitive and assumed conclusions, dozens of supporting technical and reference documents, and a broad range of acknowledged impacts ranging from aquatic biology to environmental justice and socioeconomics.

PPS has completed an initial review of the EA, however the limited time provided to review this comprehensive document (approximately 6 weeks), has not afforded PPS time to complete an in-depth review and analysis informed by outside consultants or experts. Even though PPS's initial review is only cursory, a number of potential significant short and long term impacts have

been identified. Additional time and information will be necessary to compile a more thorough list of concerns. Below is a preliminary list of concerns and questions:

- **Air Quality.** The SW corner of Tubman is currently located only a little over 50 feet from the closest north-bound lane of I-5. This project will reduce that distance to less than 30 feet. On the north side of the school, students spend time outside before, during, and after normal school hours. Many assumptions have gone into estimating the impact of this project on future automobile emissions. In addition, great weight appears to have been given to projections of future automobile emissions, including the basic assumption that expanding I-5 will result in a long-term decrease in congestion, which is not universally accepted by knowledgeable analysts. Since Tubman is occupied by almost 500 young students, this complex issue demands a more thorough analysis, understanding, and description of all variables and unknowns. ODOT has yet to release the assumptions underlying the findings on air quality, making it impossible to evaluate any conclusions in the EA.
- **Soil Stability.** The site of Tubman Middle School is known to contain poorly compacted fill material. The proposed changes to I-5 are situated within feet of the existing Tubman school building, prompting several questions that have not been answered. For example, how will ODOT ensure that the design and construction of the proposed changes will not negatively impact PPS property or the Tubman school? How will ODOT design and construct any retaining wall elements adjacent to the site to not interfere with the timber pile and micropile foundations that are at Tubman Middle School? Have these issues even been considered in the development of the project?
- **Sound Wall.** ODOT is proposing a sound wall along the right-of-way adjacent to Tubman Middle School which prompts additional questions: How will ODOT ensure the design of the proposed improvements and the construction of the proposed improvements will not negatively impact PPS property or the Tubman school? Does ODOT's proposed sound wall start at the top of the retaining wall that would be required to expand the freeway, or would the required height for a sound wall be included in the overall height of the retaining wall? How will the wall affect air flow around the school—could it funnel even more pollutants into the air surrounding Tubman?
- **Noise.** ODOT discusses noise levels that were monitored and their predicted future levels at multiple locations along the right-of-way. However, looking into the locations and their relationships to the project site, they do not appear to provide a model that is similar to the relationship of the Tubman site and the project site. None of the locations where noise was monitored are as close the project site as Tubman is (50'), and none of the monitored sites have similar elevation profiles in relation to the project site as Tubman Middle School has. All of the monitored sites are currently buffered from the project site by distance, elevation change, or adjacent buildings, and foliage. How will ODOT design noise mitigation requirements without exact noise measurements at a school that is one of the closest, least buffered, properties adjacent to the project site?
- **Construction.** ODOT's proposed project area is directly adjacent to the Tubman site. ODOT's proposed design would install new travel lanes less than 30 feet from Tubman school. There are several hundred students in the Tubman site every day during the school year from August through June. How will ODOT's project plan minimize or

mitigate potential impacts to the learning environment of those students during the construction phase of the project? How does ODOT propose to construct the new lanes closer to the Tubman site? Will ODOT need to access the Tubman site to execute their project plan? What dust and noise control measures will ODOT put in place to minimize or mitigate potential impacts to the learning environment at the Tubman site? What kind of vibrations will be felt in the building?

- Traffic. Changes to the routing of local streets during and after construction have the potential to change the level of service on local streets and intersections receiving traffic being routed from closed streets (N. Page St./N. Vancouver St. and N. Page St./N. Williams Ave.) and from the addition of new streets (Hancock/Dixon Crossing). These changes in traffic and pedestrian patterns will have both direct and indirect impacts on both the Tubman and BESC sites and may increase risk of injury for students and staff. We are particularly concerned about whether it is feasible for school buses to use Tillamook Street.

The potential impacts of the proposed project to Harriet Tubman Middle School are particularly troubling. The Harriet Tubman Middle School opened in 1952 as Eliot Elementary School. The neighborhoods served by Tubman have traditionally been more diverse than most other schools in the district. Additionally, the Eliot and Albina neighborhoods suffered some of the most significant impacts from freeway and urban renewal projects in the latter half of the last century, from poor health outcomes from environmental hazards to gentrification and dislocation. City and state agencies are required to apply both an equity lens and a public health lens to project planning. The historical legacy of damage to these communities demands that the proposed I-5 Rose Quarter Improvement Project receive a higher level of scrutiny to ensure the negative consequences of past projects are not repeated.

The creation of Tubman Middle School in the early 1980s at the former Eliot School had historical significance, as it played a pivotal role in the struggle over school desegregation and racist busing policies in Portland during the 1960s-1980s.

Additionally, Tubman reopened as a middle school in 2018 as part of a district-wide Middle School Framework to provide students with a more comprehensive middle school experience and better preparation for high school. The Framework is now in its second year of implementation. The long term successful implementation of this Framework depends, in part, on students being educated in a building free of concerns related to impacts from project construction and longer term impacts from ambient air quality, noise, and vibrations.

Enrollment at Tubman has traditionally been more diverse than other schools in the district. The current enrollment of 491 students is 40.5 percent African American and 14.9 percent Latinx, and 73.5 percent of the students are considered historically underserved. Districtwide averages by comparison are 16.3 percent and 8.9 percent for Latinx and African American enrollment respectively, with 49 percent considered historically underserved.

It is PPS's position that the depth, complexity and severity of potential significant short and long term negative impacts to PPS facilities, staff, students, families, and stakeholders warrants a full environmental impact statement (EIS). An EIS will provide a better understanding of the impacts of the proposal and development of potential mitigation options. And given that new information on the assumptions underlying the Environmental Assessment continues to become public near the end of the comment period, we are also asking for an extension of the comment period beyond the April 1 deadline.

Again, PPS appreciates the opportunity to comment on Environmental Assessment for the I-5 Rose Quarter Improvement Project.

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