This seems to imply that City will be unable to provide "safer and greater" conditions for bicycling without this project. This is untrue.

There needs to be careful consideration between the no-build and revised scenarios for how they impact bicycling: walking and transit. The North Williams corridor is a critical segment. The no-build scenario has low traffic conditions in a major bicycle corridor. The existing bicycle infrastructure is inadequate for creating conditions that minimize delay and accommodate large volumes of cyclists (Portland Transportation System Plan; Major City Bikeways Classification description). It treats conditions that are arguably safe, comfortable, and convenient for people of all ages and abilities [Central City 2035 Policy 3.10; Portland Comprehensive Plan Policy 9.21].

While working in earnest to maintain and improve upon conditions found in the no-build scenario, the revised build concepts under discussion are far from being funded plan sets so the risk of an outcome contrary to city policy remains a strong possibility. Indeed, desire for similar improvements on other parts of the plan are exciting discussions about "betterments" with the city having to pay for them. This strong possibility of negative outcomes is bolstered by the difficulty of successfully addressing the introduction of freeway traffic volumes and behaviors into an area denser with walking, biking and transit.

This does not mean at all that conditions for biking, walking and transit in the No Build can be compared to the very different environment that will develop with the Revised Build.

Similarly, North Williams is a Major Transit Priority Street. As such it is intended to "...facilitate the frequent and reliable movement of transit vehicles..." (Transportation System Plan Major Transit Priority Streets). It serves as a major egreg for two bus routes, one of which is a frequent service route. It is not clear how the Revised Build scenario will improve upon the No-Build, low-traffic egreg provided by North Williams. With limited space, the introduction of freeway ramp traffic to the corridor, and restricted signal phasing at Wlacker Street it appears that conditions for transit will deteriorate, which is not in line with city policy.

What the revised build scenario would seem to superficially meet some policies for the Lloyd District found within the Central City 2035 plan; at least the project seems to not egregiously violate them—the scenario still misses the overall thrust of those policies for the district. Policy 3.10.2 discusses new automobile-oriented uses and encourages surface lot development the enriches the pedestrian environment. Policy 2.4 expresses the desire to manage Central City transportation so as to prioritize modes other than the automobile to accommodate travel demand. Similarly, the project abounds certain core elements of the Lloyd District policies, especially those associated with the Green Loop. Both the Clackamas Crossing and the Green Loop figure prominently into the Central City 2035 Plan. Indeed, an entire Volume of the Central City 2035 Plan is dedicated to the Green Loop (Volume 5B: Implementation: The Green Loop).

The permanent loss of the potential for a Clackamas Crossing because of the design found in the Revised Build scenario is contrary to the vision of the Lloyd District and the role the Crossing was intended to play in both the Green Loop and as a feature of the Clackamas Flexible Street Strategy, which is intended as a "string of desired parks roughly along NE Clackamas Street" The Central City 2035 Recommended Craft Studies List shows the Clackamas Flexible Street Strategy extending to the Rose Quarter via the Clackamas Structure (Central City 2035 Volume 2B Transportation System Plan Amendments). Shown as a "New Connection" on both the bicycle and pedestrian Classification maps, the Clackamas Crossing was intended to contribute meaningfully to both.

The Revised Build scenario posts that the Green Loop will run along NE Broadway and Wlacker through the area of freeway interchange ramps. The Design Principles for the Green Loop identified in the Central City 2035 Plan (Volume 5B) include that it be multi-use path, include a connected corridor, they the pathway feature wayfinding and environmental design tools to brand and identify it as part of the Green Loop and include unique street furnishing to accomplish the same. Achieving these design principles will be difficult with the Green Loop relocated to Broadway and Wlacker. Those corridors will be constrained by available width and will also have to fit their roles as Major City Bikeways. As Major City Bikeways, these corridors are also principal commuter and transportation routes for people using bicycles. While the functions of the Green Loop and major bicycle transportation corridors can co-exist, to do so requires accessible width that does not seem present in the Revised Hybrid Design.

This is presumably based on not achieving the realization of the Central City Multimodal Mixed Use Area (MMUA) and the subsequent need to apply long-established TIP requirements for automobile congestion. However it’s not clear that ODOT’s written correspondence is required for a MMUA designation that is more than one-quarter mile of any interchange ramp (Portland Central City Multimodal Mixed Use Agreement Between the City of Portland and the Oregon Department of Transportation June 15, 2016, Central City 2035 Volume 2B Transportation System Plan Amendments). This indicates that many of the development goals in the Lloyd District could still be implemented as long as they were more than five blocks away from the interchange ramp.

Even developments within a short distance of freeway interchanges may be allowed depending on the outcomes of a congestion analysis. Only in the scenario in which new structures generate significant levels of congestion would they have a potentially negative outcome on the freeway. Congestion pricing and equitable transportation pricing in general have elsewhere proven effective tools to minimize automobile transportation and congestion. Under such a scenario increased development—even within one-quarter mile of freeway interchanges—would not necessarily have a negative effect on the freeways and could be allowed.

It is not clear that the Revised Build does fully comply with City’s comprehensive plan. As noted elsewhere, the Revised Build superficially meets the letter of some policies for the Lloyd District. However, the absence of the Clackamas Crossing and the difficulty of achieving design principles for the Green Loop—both contained within the policies for the Central City (Central City 2035 Plan)—are both not in compliance with City Policies. In addition, it is not clear that the Revised Build Scenario is capable of improving upon the No Build Alternative in regard to city policies that emphasize the safety and comfort of people bicycling on the city’s bikeway network; reflect a desire to create conditions that make bicycling more attractive than driving [Comprehensive Plan Policies 5.21 and 20.2, respectively]; to minimize the delay of people bicycling; to design for large volumes of people bicycling; and to build the highest quality facilities possible [Portland Transportation System Plan, Major City Bikeways].

This does not present an accurate picture of the crash scenario. Extend this comparison to consider PDX a B 8 crashes and fatal crashes. Extend that comparison to the B31 crashes on the highway system, too. Only by assessing the quality of the crashes are we adequately aware need.

Below in response to: "Between 2011 and 2015, there were 268 crashes on the street level network in the Project Area" this does not present an accurate picture of the crash scenario. Extend this comparison to consider PDX a B 8 crashes and fatal crashes. Extend that comparison to the B31 crashes on the highway system, too. Only by assessing the quality of the crashes are we adequately aware need.

Below in response to: "Goals may be carried forward beyond the NEPA process..." What does that mean? Is it typical that goals are not carried forward beyond the NEPA process? What would that look like?
Improvement of Log
12/27/2022

Reviewer
Comment

Name Bureau Date Document Page

No. Reviewer

8 12/09/2022 SEA 2.2.1 12
Roger Geller PBOT Below comment in response to: "The No-Build Alternative consists of existing conditions and any planned actions with committee funding in the Project Area (see Oregon Metro...financially constrained project list.)"
Are projects on the financially constrained RTP the same as those with "committed funding"?
Where does tolling fall under this?

9 12/09/2022 SEA Figure 2-6 17
Roger Geller PBOT Below comment in response to Figure 2-6: "Project Cross Section (NE/SE Weaver overcrossing) Proposed Improvements"
Is this showing the same location as that in Figure 2-7? It’d be good to do so to provide an apples-to-apples comparison. Are shoulders shown in proportionate width? Doesn’t seem so as 1/2 shoulders would be approximately the width of a freeway travel lane. Review cross section to make sure visually accurate and a direct comparison to previous image. Otherwise it’s misleading. Very small note says it’s not to scale. Is it easy enough to create a scaled drawing? Why not do so?

10 12/09/2022 SEA Figure 2-7 19
Roger Geller PBOT Below comment in response to Figure 2-7: Building Parameters on the Cover
Legend says that “Up to 6-story lightweight buildings would be possible with strict constraints through design modifications to bridge type and roadway profiles.”
What are the "design modifications to...roadway profiles" that will be required to provide up to 6-story buildings? Given that taller buildings are a desire of the community the project is attempting to serve, it would be good to understand the implications of "design modifications" to "roadway profiles."

11 12/09/2022 SEA 2.2.2.5 24
Roger Geller PBOT This entire section is unnecessarily specific, and does not necessarily reflect what the final configuration would be. Seems like all this is subject to ongoing design discussions. Does stating this in such a determinative manner preclude future design flexibility?

12 12/09/2022 SEA 2.2.2.7 44
Roger Geller PBOT This section doesn’t discuss improvements in Williams between McCormich and Ramsey. Why is that omitted?

13 12/09/2022 SEA 3.2.2.2 29
Roger Geller PBOT Below comment in response to: "The Revised Build Alternative is a safety improvement project that does not substantially improve highway capacity"
To understand this we’d need to know the peak hour(s) flow rate of both the No-Build and the Revised Build. If the Revised Build trans out the links in the existing system, wouldn’t that have the effect of increasing capacity. While the project may not recognize "reduced demand" it is an important consideration for many road users. Understanding the potential for increased capacity seems a necessary step in being able to compare the two options.

14 12/09/2022 SEA 3.3.2.2 34
Roger Geller PBOT Below comment in response to: "The Revised Build Alternative would not substantially improve highway capacity and is not expected to reduce growth or create other effects that would cause indirect impacts."
What is the basis for this expectation? This need be analyzed from the perspective of potential induced demand.

15 12/12/2022 SEA Exec Summary 15-7
Nick Falbo PBOT Is it clear that the revised build alternative would improve connectivity on the local system? The relocation of the SE freeway to Ramsey Way seems to complicate the local street system with added freeway access circulation needs.

16 12/12/2022 SEA 3.3.3.2 91
Nick Falbo PBOT When describing the Revised Build Alternative, the SEA states: "In addition, the bicycle and pedestrian improvements on NE Broadway and NE Weidler would provide connection with the Green Loop, outlined in the Adopted Central City 2035 Plan," this route is offered up as an alternative to the Clackamas Corridor included in the Revised Build Alternative.
The Clackamas Crossing proposed had a strong policy support as a key recommendation in the I-5 Broadway/Weidler Facility Plan adopted by resolution 16072 in 2012, and the Central City 2035 Plan report adopted by resolution 37361 in 2018. The removal of the Clackamas Crossing and recommendation of a Broadway/Weidler alignment limits the project’s ability to deliver on the goals and principles of the Green Loop as described in the Central City 2035 Plan.

17 12/12/2022 SEA 1.2 2
Sere Gastaldi PBOT The sentence about pedestrian safety is misleading, "the Broadway/Weidler interchange and the surrounding area are characterized by frequent traffic congestion and accidents resulting in pedestrian and bicyclist injuries."
While Broadway is on the high Crash Network for all pedestrians, including pedestrians, the Broadway/Weidler interchange intersection is not a High Crash intersection for pedestrians. There are no intersections in the project area that are considered high need for pedestrians. [https://www.portland.gov/transportation/crashmap/high-crash-network]

18 12/12/2022 SEA 2.2.2.25 21, 94
Sere Gastaldi PBOT Ongoing crashes in a Portland District has to be shown and doesn’t advance the goals of the CTP or PedFRA. Policy 6.10 or the TSP states “Improve pedestrian safety, accessibility, and convenience for people of all ages and abilities.” Closing crosswalks is out of direction for travel for pedestrians.

19 12/12/2022 SEA 3.3.2.2 56
Nick Falbo PBOT This section states that the Revised Build Alternative "is compliant with policies identified in the Adopted Central City 2035 Plan (2012) specific to the Rose Quarter."
This statement is questionable due to the significant departure from the Adopted Central City 2035 Plan as it relates to the Green Loop. The original 2019 Build Alternative was much more compliant with the policies of the Adopted Central City 2035 plan.

20 12/12/2022 SEA 3.6.2.2.2 56
Nick Falbo PBOT The description of the removal of the Clackamas Crossing from the Build Alternative and the relocation of the Green Loop alignment to Broadway/Weidler fails to document the decrease in comfort and function introduced by this change.

21 12/12/2022 SEA 3.6.2.2.2 56
Sere Gastaldi PBOT There are additional streets with crossing gaps (First, Wheeler, Multnomah), as well as a few deficient crossings (see PedFRA maps for more info)

22 12/12/2022 SEA 3.3.3.2 94
Sere Gastaldi PBOT TSP Policies 9.0 and 9.19 guide us to prioritize walking over other modes and to improve pedestrian safety, accessibility and convenience. The Revised Build Alternative will reduce safety and convenience for pedestrians (page 94 of the SEA states that).

23 12/12/2022 SEA 3.3.3.2.7 99
Gena Gastaldi PBOT Where is the discussion on the removal of the Clackamas Crossing and the impacts of that decision on pedestrian connectivity?

24 12/13/2022 SEA 3.3.3.2.9 99
Sere Gastaldi PBOT Are benefits to connectivity from filling street gaps on Wheeler/Williams will be cancelled out by the freeway off-ramp landing at that location.

25 12/13/2022 SEA 3.3.3.2.9 97
Gena Gastaldi PBOT The ramp terminal changes in the Revised Build Alternative clearly worsen the pedestrian experience on Williams near the Moda Center and at Weidler. I am particularly concerned with how the ramp and the intersection will work during large pedestrian events, such as before/after any event at the Moda Center. The SEA states "increased potential for pedestrian auto conflict due to placement of the 1/2 SB off ramp." This is unacceptable and clearly defies TSP 9.0 and 9.19.

26 12/13/2022 SEA 3.3.3.2.7 99
Sere Gastaldi PBOT ESA says that conditions would be improved by reducing element, such as crossing & travel lanes... What is this referring to?

27 12/13/2022 SEA 3.3.3.2.7 99
Gena Gastaldi PBOT Reference PBOT Lighting Guidelines

28 12/13/2022 SEA 3.3.3.2.7 99
Sere Gastaldi PBOT Vision Zero should be reviewed for all intersections, not just uncontrolled. [https://www.portland.gov/sites/default/files/2022/04/Vision-Zero-State-Directive-2020-03-03.pdf]

29 12/14/2022 FR 3.4.1 Page 14
Lisa Strader PBOT Removing crosswalks at NE Broadway in conflict with City priority for pedestrians as stated in our TSP and PedFRA. Removing the Clackamas Crossing has the same negative impact on pedestrians.

30 12/14/2022 FR 3.4.1 Page 10
Lisa Strader PBOT Temporary construction impacts to A7 are understandable. Clear, consistent, well maintained wayfinding and communication through social media and to CDOT’s will be very important to ensure pedestrian and cyclist safety.
The removal of the Clackamas Crossing of I5 creates considerable out of direction travel for people walking and biking. The report mentions that, but fails to explain the decrease in comfort and convenience experienced by anyone not using a car.

The updated PedFDSI prioritization didn’t change the scoring of corridors or intersections. Instead it shows what has been completed since 2019 and what is left. That analysis is complete and I can provide it to the project team.

The entire last paragraph is inaccurate.

PedFDSI uses a combined score (safety, equity, demand) to prioritize 3 types of need: sidewalk gaps, crossing gaps, and crossing deficiencies.

I think the first part of the paragraph is describing the prioritized crossing gaps, which means the street doesn’t meet our crossing spacing guidelines. It’s unclear as written. The paragraph refers to Broadway and Weidler as a tier 2 project; unclear what this is referring to.

Crossing deficiencies are existing crossings that don’t meet our standards. Those are tier 3 - I list 3 in the document states.

The Revised Build cross section drawings show a 4 and 5 lane cross section on Broadway. The document repeatedly states that the pedestrian crossings of Broadway would be shortened in the new design. The existing cross section is 6 lanes. I fail to see how this design reduces pedestrian crossing widths and increases comfort.

Revising lack of street trees in the cross sections.

"The Revised Build Alternative would also make pedestrian and bicycle improvements along NE Broadway and NE Weidler Streets, which are both identified as high priority corridors [Tier 2] in the PedFDSI plan."

Again, I have no idea what this is referring to. This is inaccurate. Broadway-Weidler are Major City Walkways and the Ped Priority Network but I don’t know what the Tier 2 is referring to. There are no sidewalk gaps. There are tier 3 crossing gaps, which are outside of the API and aren’t addressed in this project.

The conditions for walking in the Riverfront would benefit from improved sidewalk connections and pedestrian crossings, coupled with a reduction in intersection complexity. Increased walking activity would support local and regional pedestrian mode share goals. These benefits would occur along with slightly improved grades and the loss of two crosswalk street crossings and the adverse effects of those changes.

This paragraph fails to take into account the loss of the Clackamas Crossing and the addition of the 6 off ramp at the Moda Center.

As noted at the start of the Moda section, the Clackamas Crossing was part of the 2015 plan. Its elimination and replacement with access on NE Broadway is not equivalent. It definitely doesn’t support Portland’s commitment to pedestrians being our top priority. Similarly, the off ramp at N. Willamette also impacts pedestrians significantly, necessitating permanent crosswalk closures and adding to pedestrian safety issues during Moda Center & Memorial Coliseum events where there is significant pedestrian movement to and from the venue.

Reinforcing Gena’s comment above about not seeing the reduced crossing distances based on the cross sections showing 4 vs 5 lanes of vehicle/transit traffic.

Regarding “Long Term and Operational Impacts”. Physically separated and raised bicycle facilities are the city of Portland standard for any new construction. They would have been included in the “Build” scenario, too. Instead, there are multiple notes and drawings from that earlier design demonstrating that raised facilities were to be provided.

Regarding “These impacts are both positive and negative but not substantial”: The changes to NWs; resulting from being channelized (5-off ramp traffic, are substantial, as described in subsequent comments.

Regarding “Reduction of intersection complexity”: Not clear that intersection complexity will be reduced, the opposite seems more likely. Closing of pedestrian crosswalks will increase complexity by requiring multiple crossings where only one is needed today.

Bike crossings also become more complex, especially for the major bikeway flow that is northbound on Willamette. Exclusive signal phasing will be required, where none is needed today. This will result in increased delay for people biking.

Storage for waiting and turning cyclists is ample today under existing conditions and would have been under the build scenario. Elimination of freeway off-ramp traffic onto NW Willamette will challenge the ability to create sufficient storage for both the northbound flow of cyclists from further south on Willamette as well as for the eastbound to northbound flow of cyclists approaching the Willamette-Weidler intersection from the west. This lack of adequate storage is what will become a high traffic volume environment would seem to increase rather than reduce the complexity of operation at these intersections for vulnerable roadway users.

In addition, it is not clear how people biking will be effectively move north. Both no build and build conditions had people bicycling operating in a low traffic volume environment. The Revised Build environment will have much higher traffic volumes in the NW Willamette corridor between Riverway and Broadway. This will create challenging conditions for people bicycling to make the necessary maneuvers to avoid conflicting automotive traffic at Weidler-Willamette, to avoid the traffic accessing the northbound I5 ramp on the left side of Willamette north of Broadway and then gain access to the existing left running bicycle lane on NW Willamette north of Broadway.

Depending on the ultimate configuration, this also poses potential complexities for westbound cyclists on Broadway wishing to head to the left running bicycle lane on NW Willamette.

Regarding “...the Clackamas Bicycle and Pedestrian Bridge...is no longer a design feature”: The loss of the Clackamas Structure is a significant loss as it was featured in the Lloyd District’s Central City 2035 policies as a key feature of The Green Loop as well as an extension of the proposed flexible street design along Clackamas Street.

Regarding “The Revised Build Alternative would include upgraded physically separated and raised bike facilities...” As stated previously, Portland’s design standard for new roadway construction is the provision of elevated, protected bicycle lanes. They would have been required in the Build scenario. There is no difference between the scenario on this point.

Regarding “...could provide an opportunity for new and modern bicycle facilities...” “New and modern bicycle facilities” would be a city requirement along roadways affected by the project. This makes it sound like it is only an option (use of the phrase would provide an opportunity)

Regarding “Construct wider sidewalks and bike lanes at sidewalk level...” As stated elsewhere, sidewalks and bike lanes of specific width based on roadway classification and expected use are to be provided as standards as part of the construction. Such improvements would be standard under both the Build and Revised Build scenarios. This would include the appropriate intersection treatments.

It is worth noting that a number of the protected bicycle signal phases are required in the Revised Build scenario in response to design changes. The Revised Build scenario in introducing higher volumes of automotive traffic onto bicycle corridors than would have occurred in the Build scenario. This increases the threat at multiple intersections and thus necessitates a higher level of treatment.
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<tr>
<th>Comment No.</th>
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<tbody>
<tr>
<td>47</td>
<td>Roger Geller</td>
<td>PBOT</td>
<td>12.16.2022</td>
<td>AT Supplemental</td>
<td>TR</td>
<td>15</td>
<td>Regarding: &quot;Remove the two-way cycle track on N Williams Avenue...&quot; These elements remain part of the design discussion. It doesn’t seem appropriate to call them out here with this level of specificity.</td>
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<td>48</td>
<td>Roger Geller</td>
<td>PBOT</td>
<td>12.16.2022</td>
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<td>15.21</td>
<td>Figure 6</td>
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<td>49</td>
<td>Roger Geller</td>
<td>PBOT</td>
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<td>AT Supplemental</td>
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<td>15</td>
<td>The Oregon HDM was recently updated to incorporate into the Blueprint for Urban Design, which specifically addresses designs for travel lanes, sidewalks and bike lanes.</td>
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<td>50</td>
<td>Roger Geller</td>
<td>PBOT</td>
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<td>15</td>
<td>Regarding &quot;City of Portland Protected Bicycle Lane Planning and Design Guidance:&quot; This is one Portland Guide, unchanged since the Build scenario, that identifies sidewalks-level protected bicycle lanes as the preferred design.</td>
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<tr>
<td>51</td>
<td>Roger Geller</td>
<td>PBOT</td>
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<td>15</td>
<td>Regarding &quot;The majority of the project area is within the Central City Pedestrian District: The majority of the project area is also classified as a Bicycle District in the city’s Transportation System Plan.</td>
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<td>52</td>
<td>Roger Geller</td>
<td>PBOT</td>
<td>12.16.2022</td>
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<td>Regarding the &quot;Affected Environment:&quot; likely this was covered in the 2019 PP, but it still seems an omission to not mention it here. This section neglects to discuss the affected environment in terms of bicycle transportation and transit. The Vancouver-Williams corridor is a major bicycle corridor between the Steel Bridge points north of the A1P. It is one of the busiest corridors in the city for bicycle transportation. Both roadways are classified as Major City Bikeways, though they carry lower bicycle volumes than Vancouver-Williams.</td>
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<td>53</td>
<td>Roger Geller</td>
<td>PBOT</td>
<td>12.16.2022</td>
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<td>The north south corridor also carries two bus lanes, including one that is frequent service.</td>
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<td>54</td>
<td>Roger Geller</td>
<td>PBOT</td>
<td>12.16.2022</td>
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<td>Regarding &quot;The Revised Build Alternative would accommodate bicyclists...&quot; Given ongoing design conversations this is too specific. These designs have not been agreed upon. They are likely to be different from what is described here.</td>
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<td>55</td>
<td>Roger Geller</td>
<td>PBOT</td>
<td>12.16.2022</td>
<td>AT Supplemental</td>
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<td>15</td>
<td>Regarding &quot;The 5 southbound off-ramp would be relocated...&quot; This relocation introduces freeway off-ramp traffic onto a major bicycle corridor and also serves one transit lane, one of which is a frequent service lane. This adds complexity and not to a corridor that under both the No Build and Build scenarios would have remained low volume. It is not clear there will be adequate facilities to prevent a degradation in service, safety and comfort to users of that corridor. The Williams-Wilson intersection is especially challenging as it receives significant flows of people walking both eastbound and westbound.</td>
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<td>56</td>
<td>Roger Geller</td>
<td>PBOT</td>
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<td>15</td>
<td>Regarding &quot;NE WiU Wendler Street&quot; and blue signs: This signal is necessary due to introduction of freeway off-ramp traffic onto a major bicycle corridor. The conditions will neither be safer nor more comfortable than those that would exist under the No Build or Build scenarios.</td>
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<td>57</td>
<td>Roger Geller</td>
<td>PBOT</td>
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<td>The signal at NE Hancock Street and is likely to be introduced increased cyclist, transit and pedestrian delay. Hancock is not a City Bikeway and is unlikely to be used extensively as an east-west bicycle connection.</td>
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<td>58</td>
<td>Roger Geller</td>
<td>PBOT</td>
<td>12.16.2022</td>
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<td>15</td>
<td>Regarding &quot;Compare to 2 planned 1-5 crossing of NE Columbia Street...&quot; The Revised Build designs for Broadway and Weidler are identical to what the city would have required of this project under the Build scenario. Approximately 23’ of pavement would be allocated in both scenarios, which is consistent with Portland's preferred form for a pedestrian space and bicycle space. This is identified in the Portland Protected Bicycle Lane Planning and Design Guide. As a standard desired design for sidewalks with adjacent sidewalks-level bicycle lanes, this design still falls short of the Green Loop Design Principles identified in the Central City 2035 Plan (Volume 5B). This is a significant impact to the plans for the Green Loop through the Lloyd District.</td>
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<tr>
<td>59</td>
<td>Roger Geller</td>
<td>PBOT</td>
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<td>TR</td>
<td>15</td>
<td>These designs shown for the Build alternatives would not have been acceptable to the City of Portland based on City standards for sidewalk level bicycle lanes.</td>
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The City of Portland does not use and does not agree with this type of Bicycle Level of Traffic Stress analysis for specific intersection and corridor segments. This type of analysis has not been significantly vetted so as to provide meaningful information at the level of detail suggested here. The tool, when originally developed, was intended to provide a very high level analysis for an entire network of bikeways and not a detailed assessment of ground level facilities.

ODOT's Analysis Procedure Manual (Version 2, 2018) states that "Use of LTS for project development and development review should be limited to a screening-based analysis to quickly identify existing and future needs." It states this indicating that LTS is an appropriate tool for regional transportation plans and other transportation system plans. It is not recommended for "Facility Play/Interplay Area Management Plans" for project development or development review.

This is too blunt of a tool to provide meaningful information for these intersections. Instead, it serves to distract from the level of detailed analysis and consideration required for these intersections and segments that will experience the most change in automobile volumes. Instead, the LTS analysis is based principally on width of bicycle facility and prevailing or posted speed. Most modern guidance, including ODOT's is based on traffic volumes as well as speed. As LTS analysis was developed well in advance of popular adoption of protected lanes, it focuses only on width of bike lanes and does not take protected facilities into consideration.

In addition, ODOT's guidance in their Analysis Procedures Manual differs significantly from the city. The ODOT manual suggests that "Bicycle facilities with greater separation from vehicles rate higher than shared or lesser separated facilities. Widened bicycle facilities will rate better than narrower or non-existent ones (ideally, arterials 7000+ AADT) have separated facilities (i.e. buffered bike lanes, cycle tracks, bike paths); collectors (1500-7000 AADT) have bike lanes..." ODOT's guidance is clear that protected lanes are required at volumes greater than 6000 AADT and at 95th% speeds greater than 26 mph. However, ODOT also states that protected lanes are not considered at volumes as low as 1500 AADT, depending on conditions. By city policy and design guidance, protected lanes are always the preferred treatment whenever separation is called for.

This difference in approach further calls in to question the appropriateness of using an ODOT LTS tool that was created with significantly different base assumptions in suitability of conditions for bicycle transportation. As noted by ODOT, the LTS methodology may be a modified version of what had initially been reported in 2012 as a NHTSA Transportation Institute report. Knowledge and research have both advanced considerably since then, as has an understanding of what conditions are considered "comfortable" by an average person who may be interested in bicycling.

ODOT does acknowledge that the "Bicycle Level of Stress does not include other factors that may be important to bicycle riders that should be taken into consideration when applying this methodology. These can include presence of steep or long climbs, poor pavement condition, heavy vehicle use..." Heavy vehicle use is of utmost importance in this instance.

Regarding '12 Williams...15 Williams...' that the ODOT LTS analysis concludes that the Revised Build will create improved conditions relative to No Build or the Build scenarios on the segments of 16 Williams between Wider and Broadway and between Broadway to Hancock highlights the insufficiency of this tool to provide meaningful information.

Existing conditions on N Williams between Wider and Broadway are favorable for bicycling. The northbound movement from Williams between Wider and Broadway currently carries mostly bicycle traffic. Thus, when northbound Williams traffic at Wider receives a green indication, it is principally bicycle traffic only. This low ADT environment works well for people bicycling as it allows them to set up in the middle of the roadway in a manner that aligns comfortably with the left side bikeway on Williams north of Broadway.

The Revised Build scenario will include much higher volumes of automobile traffic. While good quality facilities can overcome the issues posed by higher auto volumes, the environment will be inherently more stressful than either the No Build or Build conditions.

In addition, the configuration is likely to introduce delay to the movement of people bicycling. It is also unclear whether the design will accommodate the volumes of people currently bicycling through this area.

On Williams between Broadway to Hancock people bicycling may identify the true nature differences between the scenarios. These are examples of how the blunt tool that is the LTS analysis fails to identify the true nature differences between the scenarios.
Regarding Conclusion/Direct Impacts: While the quality of facilities may improve, that improvement is necessitated by the increased demands placed on the system due to freeway off-ramp traffic. Considering the stress of proximity to traffic, increased delay and undersized facilities is difficult to see how conditions for bicycling in the Revisited Build scenario will be better than those in either the No Build or Build scenarios. Based on the above, they are likely to be worse. Not accommodating large volumes of people bicycling and introducing delay violate several city policies.

The cumulative impact of eliminating the Dickson Crossing and adding the I-5 SB off-ramp at Williams are significantly negative to pedestrians, including people with disabilities, and are in conflicts with city policies that prioritize pedestrian movement and safety.

Pedestrian conditions at the Williams/NE Weidler intersection are acknowledged as being difficult under the IRA. This doesn’t support city policies that prioritize pedestrians.

Given how busy this location is before and after events at the Coliseum and the Moda Center, this is a concerning statistic that doesn’t align with City of Portland guidance and priorities for pedestrians.

The location of the I-5 SB off-ramp serves a conflict with city guidelines.

A section acknowledges the reduced off-ramp and crosswalk closures will reduce pedestrian safety. This is in conflict with city guidelines and plans.

This section again acknowledges pedestrian safety issues with the off ramp and crosswalk closures including recognition for more vehicle/pedestrian conflicts. City staff agrees. Portland guidance prioritizes pedestrian safety over vehicle traffic efficiency.

This previous design reduced ramp at NE Ramsey Way which allowed for safer bicycle and pedestrian pathways. The current proposal creates similar design for bicycle and pedestrian users at the intersection of Ramsey/Wheelers/Baum. It is not only less safe than the previous design but it is potentially less safe than a no-build alternative. Vehicles trying to access the Moda Garage will now have to navigate through 6-8 congested intersections with heavy bicycle and pedestrian traffic which creates unnecessary congestion, degrades the event patron experience and creates numerous conflict points with heavy pedestrian and bicycle traffic.

This Rose Quarter campus facilities, which include the privately-owned Moda Center and City-owned Veterans Memorial Coliseum are vital cultural and economic drivers for the greater Portland region. No other event complex in the State can host the same quantity and types of events. Portland’s Comprehensive Plan Policy 6.3 Central City: Transportation, Public Facilities and Economic Development directly states the City’s support in the ongoing viability and success of the regional entertainment and event complex. It is not clear that the revised SEA provides a viable future for the district with the placement of both concerts at Ramsey/Wheeler/Williams and the associated traffic, access, and safety impacts that result. Similarly, Portland’s Central City 2035 Policy Goal 3.1 advocates Portland’s support for the Central City being the premier regional center for entertainment and commerce, arts and culture, tourism, education and government and the Rose Quarter’s proximity to the Lloyd District further supports the important roles the facilities play in the region. The revised design threatens the viability of the Rose Quarter event complex and conflicts with the City’s policies.

Functional transit access to events in the district is critical and there are questions about whether the revised project may reduce transit performance, particularly on N Wheeler Ave and N Williams Ave, particularly during event situations.

There are concerns about the safety for pedestrians and cyclists in the (N Ramsey Way/NE Wheeler Ave intersection area). The proposed project creates significant new bicycle and pedestrian concerns that are likely worse than existing conditions, particularly during event situations.

The project adds a sidewalk on the east side of Wheeler—which is positive, but given the fact that there are no buildings on the east side of the street for pedestrians to access, it is not particularly useful compared to the negative impacts of concentrating all the traffic-traffic at the N Ramsey Way/NE Wheeler Ave intersection. On balance, the pedestrian situation in this area appears to be preferable in existing conditions vs the proposal, particularly during event situations.

The proposed reconfiguration of the ramps and the concentration of traffic and the required confusing and circuitous paths that vehicle traffic would have to take to access Rose Quarter garages would create safety concerns for all modes of transportation and would raise questions about the economic performance of the district at large. The revised project alternative appears to be worse for Rose Quarter event access and safety than the no-build alternative.
88 Lauren Broudy, OMF Traffic Program OMF 12/27/2022 88 Project Review 12/27/2022

AT Supplemental TR, 6.2.1 Direct Impacts, Short Term Construction Impacts 20:21

10k-level crowds considering simultaneous events in both arenas (21,000+) must be accounted for and handled appropriately. It will be absolutely critical that the regular schedule of events at the Veterans and Moda are able to happen regularly scheduled and any construction traffic detours or mitigations will result in a practicable set up to allow for these events. If construction activities prevent events from being possible, there will need to be compensation for lost revenues to the City and to the Arena Operators. Bicycle and pedestrian safety in accessing the arenas is critical.

89 Lauren Broudy, OMF Traffic Program OMF 12/27/2022 89 Project Review 12/27/2022

AT Supplemental TR, 6.2.2 Direct Impacts, Long Term Term and Operational Impacts 25

The additional sidewalks on the east side of NE Wheeler Ave are helpful but compared to the loss of the Clackamas pedestrian bridge crossing are far worse than the previous proposal and potentially worse than the no-build alternative because of the potential safety impacts of having both ramps in the proposed locations. This is particularly impactful in even situations with very heavy pedestrian and vehicle traffic at the same times.

90 Lauren Broudy, OMF Traffic Program OMF 12/27/2022 90 Project Review 12/27/2022

Historic Resources Supplemental TR, 1.2 NMRP Listed Properties 21

This is primarily open property by Vulcan that functions as part of the event district; it is needed to support large events (over-sized vehicles, trucks, buses and staff parking). These uses would need to be accommodated elsewhere if this project takes away regular, frequent public use of this lot. Not having access to this lot would create challenges to operating Moda Center and the Veterans Memorial Coliseum while they host multi-million dollar generating events.

91 Lauren Broudy, OMF Traffic Program OMF 12/27/2022 91 Project Review 12/27/2022

Transportation Safety Supplemental TR, 6.2.4 Conclusion 31

The Veterans Memorial Coliseum was placed on the National Register of Historic Places in September 2009. The protected, historic area depends on safe and efficient access via all transportation modes to remain a viable and sustainable event venue. While the Veterans Memorial Coliseum was not included in the project impact area, it does sit in the immediate vicinity and its long-term preservation depends on continued safe and functional access for all modes. For example, the Veterans Memorial Coliseum depends on safe and efficient regional access to remain a viable venue, efficient, safe and easy to understand access by all modes is critical.

92 Lauren Broudy, OMF Traffic Program OMF 12/27/2022 92 Project Review 12/27/2022

GSA, 4.1.1 Local and Regional Economy, SEA, 3.13.2.4 Traffic Operations, Revised Build 72

Design options should be expanded to include options that do not overlap the intersection (NE Wheeler Ave/W Williams Ave/W Ramsay Way) with the burden of both I-5 southbound on and off ramps. The economic thresholds of threatening the functionality of the event district (Moda Center and Veterans Memorial Coliseum) are not worth the relatively minor development impact of placing one of the ramps further north.

93 Lauren Broudy, OMF Traffic Program OMF 12/27/2022 93 Project Review 12/27/2022

GSA and Traffic Supplemental TR, 6.1.2 Conclusion 31

Based on an economic impact analysis of fiscal Year 2018-19 (the last full pre-covid year), the direct spending associated operations of the Rose Quarter Campus was estimated to be $283.9 million in the City and total output (i.e., direct, indirect and induced spending) was estimated to be $539.8 million. It estimated that approximately $1.96 was generated for every $1 of direct spending. These figures also include the Rose Quarter Campus providing nearly 7,000 full and part time jobs. The potential negative impacts of a poorly functioning Rose Quarter Campus due to newly created congestion, mobility and accessibility issues would be consequential.

94 Charles Radosta, PBOT SDL PBOT 12/27/2022 94 Project Review 12/27/2022

Safety Supplemental TR 28

On we have any off ramps along the interstate system in Oregon that match the design elements of the proposed SB off ramp, namely multiline, with a 180°+ degree u-turn that has a curve radius less than 100 feet, and with a traffic signal in the middle of the turn? As proposed the issue with this design include a lack of signal visibility, truck off trading within the u-turn, and keeping higher speed drivers from failing to navigate the turn and driving over the pedestrian waiting area between the ramps. I have not received adequate documentation to confirm whether or not this is a flaw in the design.

95 Jamie Jeffrey, PBOT Traffic PBOT 12/27/2022 95 Project Review 12/27/2022

Traffic Supplemental TR 28


There is no info about the Central City Multi-Modal Mixed Use Area mobility status for ramp terminal intersections. ODOT mobility standards do not apply, although queueing and safety still apply. Sections 18.8.2 Environmental Consequences and 3.13.1.4 Traffic Operations in the SEA would be appropriate places to acknowledge. Statements that interchange intersections would meet ODOTIN mobility standards (i.e. less than 0.4%) would not be consistent with the adopted MNL. 0.1.1 Direct Impacts in the Traffic Supplemental TR would be the appropriate place to acknowledge the MAMA. Recommend using previously suggested language from ODOT - "As part of the adoption of the Central City 2045 Plan, the Central City which includes the intersections in this table has been designated as a MultiModal Mixed Use Area (MMA). This designation provides flexibility for determining significant effects of land use actions, by lifting mobility standards requirements at ODOT facilities. Transportation standards such safety and multimodal access still apply.

96 Jamie Jeffrey, PBOT Traffic PBOT 12/27/2022 96 Project Review 12/27/2022

Traffic Supplemental TR 28


6.2.2 Future Local Street Traffic Operations also has language about mobility standards and should acknowledge the MAMA. Recommend using previously suggested language from ODOT in the Synchro-Analysis Results section of 6.2.2.2. - An mitigation is proposed for the design in prioritizing pedestrian access and safety. By providing a protected pedestrian phase, westbound and northbound approaches would have reduced green times and delays are anticipated. City has also indicated that this section finds within the MMA-designation and therefore pedestrian safety and access would be prioritized over mobility standards.

97 Jamie Jeffrey, PBOT Traffic PBOT 12/27/2022 97 Project Review 12/27/2022

Traffic Supplemental TR 28


Bicycle travel times for SB and EB, as well as EB to SB should be included. Although it wasn’t as relevant in 2018, hybrid 3:1 SB off ramp configuration directly impacts the SB and movements for bicycles. It may inform different design options (i.e. Williams crossover at Hancock vs Russell, etc) to strive for better/balanced option to provide the least impact to bike travel compared to options that delay bike travel more.


Traffic Supplemental TR 28


Moda Center events should be discussed, as they frequent enough that they would be considered common. Relevant discussion should be primarily related to ped/vehicle operations with event ingress/egress. Suggest using similar context as the traffic tech report looking toward event management.


Tech Reports 69:471:25

The Revised Build Alternate Additional Area C appears to be off-filer overlay zones. Development within offiler overlay zones is subject to Zoning Code Section 33.475. Proposed development in this area should be included in the River Review application materials.

100 ACI Brands, PBOT Complete Streets PBOT 12/27/2022 100 Project Review 12/27/2022

Transit Supplemental Tech Cover 4

The date of the report on the cover is August 2022. However, it shouldn’t be updated to a November date? We last reviewed and commented on the 2020/2019 Draft-Second review version of the report dated September 1, 2022. It is confusing to have the version dates go back in time.


Transit Supplemental Tech Page 3

Over Summary, 2nd paragraph on transit ridership: Consider adding a sentence on ridership recovery between these others. Such as: “...from 2017 to 2020. As of November 2022, transit ridership on the TRAM system was 54 percent of what it was pre-pandemic in February 2020. TriMet leadership...” https://www.trimet.org/about/performancemtrmonship.

102 ACI Brands, PBOT Complete Streets PBOT 12/27/2022 102 Project Review 12/27/2022

Transit Supplemental Tech Page 6

Section 2-4 Project Area and Fig 2- Project Area labeled E: The text needs its own bullet point. It get combined with bullet D. Given current discussions about design options that may include the Clackamas Crossing, it seems prudent to not exclude area E from the Project Area at this time. I recommend keeping it. This comment likely applies to multiple tech reports.
K19071 15 Rose Quarter Improvement Project Administrative Public SEA
City of Portland Review Log

Comments: 12/27/2022

<table>
<thead>
<tr>
<th>Comment No.</th>
<th>Reviewer Name</th>
<th>Bureau</th>
<th>Date</th>
<th>Document</th>
<th>Page</th>
<th>Line #</th>
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<tr>
<td>103</td>
<td>Bertelsen, DOT Complete Streets</td>
<td>PBOT</td>
<td>12/27/2022</td>
<td>Transp Supplemental Tech Report</td>
<td>page 10</td>
<td>2.3</td>
<td>Section 2.3 Highway Cover Changes: Include &quot;transit stops and sidewalk corridors&quot; among the other items in the sentence. Upon Project completion, the additional surface space created by the highway cover over I-5 could provide an opportunity for new and modern bicycle facilities, improved transit stops and sidewalks, corridors, making the area more connected, walkable and bike friendly.</td>
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<td>PBOT</td>
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<td>Transp Supplemental Tech Report</td>
<td>page 10-11</td>
<td>2.5</td>
<td>Section 2.5 RELATED SYSTEM MULTIMODAL IMPROVEMENTS CHANGE text and Figure 6: Given current discussions about design options that may include the Gladiolas Crossing, it seems prudent to revisit this section. This comment likely applies to multiple tech reports.</td>
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<td>Supplemental Tech Report</td>
<td>page 13-14</td>
<td>3.0</td>
<td>Section 3.0 Regulatory Framework: Add the following project to the supplement. RFP project no. 11833, North Portland Enhanced Transit Corridor. It is on the Constrained list. It is routed on N Vandervoort and N Williams between Central City and Downtown. Also in the Portland TIF, meant to improve bus reliability for bus lane 4 and 46.</td>
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<td>page 13-14</td>
<td>3.0</td>
<td>Section 3.0 Regulatory Framework: Consider adding reference to the TriMet Forward Together bus service concept completed in December 2022. It will guide their annual service improvements and route changes over the next 3-4 years.</td>
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<td>page 19</td>
<td>5.2</td>
<td>Section 5.2 TRANSPORT ROUTES: Add the Swan Island Shuttle provided by Multnomah County. Following TriMet’s line 85 route, the shuttle runs from 6:30pm to midnight, Monday-Friday, from the Rose Quarter Transit Center out to the N Fountain St./Northwest St. intersection, with three stops in between.</td>
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<td>Supplemental Tech Report</td>
<td>page 19</td>
<td>5.3</td>
<td>Section 5.3 TRANSIT STOPS AND RIDER ACTIVITY: Consider adding a sentence with updated TriMet ridership data from Fall 2022. Ridership has recovered some since fall 2020.</td>
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<td>PBOT</td>
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<td>Supplemental Tech Report</td>
<td>page 26</td>
<td>6.2.4</td>
<td>Section 6.2.4 Cumulative Effects: I noted the ODOT response to my September comments with concerns about this bullet statement. I am still stymied. Recommend some edits, even if very general, such as: The revised Build Alternative may limit enhanced Transit Corridor Plans within the AP; however, potential implementation of transit priority treatments by the ISRP Project within the AP could potentially result in speed and reliability improvements on transit operations; and mitigate for increased transit travel time impacts summarized above.</td>
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<td>Page 15-16</td>
<td>3.0</td>
<td>Section 3.0 Regulatory Framework: I did not see reference to the Lloyd District Street Design Standards. I believe they are applicable within the ISRP Project Area.</td>
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<td>3.13.2.2</td>
<td>Section 3.13.2.2 91</td>
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<td>3.0</td>
<td>Paragraph</td>
<td>[paragraph] Comment: Should also provide a crosswalk on the south leg at Ramsay/Williams. Closer can be proposed as mitigation measure for motorized traffic, to be explored during design. I know this crosswalk is currently closed, but we should open it if possible for access to the new west side sidewalk south to Multnomah. ODOT Response: The supplemental traffic analysis design assumption is that this crosswalk is maintained closed in the revised build alternative. As we continue working with the CDQ design refinements, we will evaluate opening this crosswalk during design phase. Second Draft and Final Comment: Then at least include language that it will be evaluated for inclusion in the design.</td>
</tr>
</tbody>
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Project Administrative SEA Review Log

125
Jennie Tower
PBOT
12/27/2022
Page 78

Comment: What about SB Vancouver at Broadway? I don’t see any reason not to allow the right turn with the ramp gone. Will want a right turn lane with protected rights and blue signal. ODOT Response: This will need further discussion during final Design if it is to be considered. The right lane on Vancouver, north of Broadway, is a SB Bus Only Lane which will conflict with a right turn movement. Second Draft and Final Comment: Identify in the SPP EA that this will be evaluated and potentially included during design.

126
Jennie Tower
PBOT
12/27/2022

This assessment describes impacts of a project with design elements that won’t be implemented or will be changed. And we have devoted further from this design since the preliminary draft SEA review.

127
Jennie Tower
PBOT
12/27/2022

Think the intersection of Russell/Ferby is also being modified with EFWA. Nettox/Williams, Hancock/Vancouver, Hancock/FH, Broadway/Vancouver, and Broadway/Film/Wheeler were all being modified in the previous design, but are identified as new intersections to be modified in this figure. Film/Wheeler should be identified as an intersection no longer to be modified.

128
Jennie Tower
PBOT
12/27/2022

The right lane of Vancouver, is a Bus Lane which will conflict with the Vancouver, Hancock/Vancouver, which will conflict with the right turn lane.

129
April Bertelsen, PBOT Complete Streets
PBOT
12/28/2022

Supplemental Environmental Assessment Report

Section 3.13.1.2.3.1 Transit: Short-term Construction Impacts: Add sentence or more about the potential loss of transit ridership due to the inconvenience, delays and longer transit travel times due to transit detours. There is already similar language on page 120 that could be repeated here, “Long construction periods (coupled with circuitous bus detour routes) could temporarily suppress transit ridership due to passenger inconvenience”

130
April Bertelsen, PBOT Complete Streets
PBOT
12/28/2022

Supplemental Environmental Assessment Report

Section 3.13.2.1 Transit: Short-term Construction Impacts: Add sentence or more about the potential loss of transit ridership during construction due to the inconvenience, delays and longer transit travel times due to transit detours. There is already similar language on page 120 that could be repeated here, “Long construction periods (coupled with circuitous bus detour routes) could temporarily suppress transit ridership due to passenger inconvenience”

131
April Bertelsen, PBOT Complete Streets
PBOT
12/28/2022

SEA Appendix D

Section 3.13.2.1 Section 3.13.2.2 Transportation

There is a need to ensure the highway cover is designed and constructed to maximize development potential and to allow the design, development, land use, and programming vision articulated in the Independent Cover Assessment. This means that expansion joints need to be aligned with the street grid to create rectilinear development pads, that flat surfaces be created to the maximum extent feasible for ease of development and to create programmable outdoor spaces, and that the edges of the cover create a smooth edge to adjacent lands to allow smooth transitions between development located on the cover and those located immediately adjacent to the cover.

132
April Bertelsen, PBOT Complete Streets
PBOT
12/28/2022

Supplemental Environmental Assessment Report

Section 3.16.12. Transit: Add renaming to this sentence: “opportunities could arise to implement Enhanced Transit Corridors Plan recommendations or other transit speed and reliability improvements on other corridors in tandem with the Renewed Alternatives.”

133
T Doss, BPS Lead
BPS
1/3/2023

There is a need to ensure the highway cover is designed and constructed to maximize development potential and to allow the design, development, land use, and programming vision articulated in the Independent Cover Assessment. This means that expansion joints need to be aligned with the street grid to create rectilinear development pads, that flat surfaces be created to the maximum extent feasible for ease of development and to create programmable outdoor spaces, and that the edges of the cover create a smooth edge to adjacent lands to allow smooth transitions between development located on the cover and those located immediately adjacent to the cover.

134
T Doss, BPS Lead
BPS
1/3/2023

The Retrospective of the Greenloop at Broadway-Ferby is the solution to Balconies and River Center to create a significant benefit to enhancing a safe and accessible pedestrian and the roots free connection from the City to The Project.

135
Chalon Dailey
PBOT
1/3/2023

The RMFP Sensitivity Analysis provided in Appendix D of the Traffic Analysis Supplemental Tech Report reflects that RMFP has the potential to lower the travel demand on SRG below what the project is currently using to make design decisions on the local street network. The traffic volumes assumed and being used to advance the design should be further evaluated and consideration given to developing a design that includes RMFP in the opening day configuration.
Portland Pedestrian Advisory Committee

To: Director Warner  
Cc: Sharon Daleo  

RE: ODOT I-5 Rose Quarter Supplemental Environmental Assessment

PBOT Staff and Leadership,

The Portland Pedestrian Advisory Committee (PAC) has reviewed the Supplemental Environmental Assessment for the Rose Quarter Improvement Project and the proposed "Hybrid 3" proposal. This project will create treacherous conditions for people walking on surface streets in the Rose Quarter. **We call on PBOT to oppose the relocation of the I-5 SB off-ramp, closure of crosswalks, and other components of Hybrid 3 that will worsen conditions for active modes.** The current proposal goes in the wrong direction on climate, the wrong direction on safety, and the wrong direction on our modal goals, while providing little promise of accountability and follow-through for the few positive claims it can make. PAC members volunteer their time to guide City leadership in focusing on its commitments to prioritizing pedestrian modes, and we call on PBOT to honor those commitments.

Portland has committed to prioritizing pedestrian modes in the City’s transportation hierarchy, and PBOT policies clearly direct leaders to prioritize walking over other modes to improve pedestrian safety, accessibility, and convenience. PBOT’s Transportation System Plan (TSP) Policy 9.6 states that saving the lives of our most vulnerable road users – people walking and biking – is the bureau’s top priority. Further, the TSP includes commitments to:

- Encourage walking as the most attractive mode of transportation for most short trips, within and to centers, corridors, and major destinations, and as a means for accessing transit. (Policy 9.16)

- Create more complete networks of pedestrian facilities, and improve the quality of the pedestrian environment. (Policy 9.17)

- Improve pedestrian safety, accessibility, and convenience for people of all ages and abilities. (Policy 9.18)

In the face of these clear goals, Portland has continued to struggle with a legacy of substandard infrastructure and underfunded projects, with the heartbreaking and enraging result that dozens of our friends, family, and neighbors die on our streets each year. Two members of this committee have lost children in Portland crosswalks, and many of us have been personally impacted by vehicular violence in our lives. Pedestrian fatalities reached a 70-year high in
Portland in 2022—an unacceptable and predictable result of the City not living up to their stated goals.

The I-5 Rose Quarter Improvement Project is, at its heart, a highway project focused on reducing congestion and moving automobiles quickly. While ODOT has expanded the project to include potential for connectivity of the surrounding area, its own analysis shows many areas where pedestrian safety and convenience will directly be made worse in the surrounding area. Specific examples from the SEA include:

- “The relocation of the I-5 SB off-ramp at the intersection of NE Wheeler/N Ramsay/N Williams (formerly NE Wheeler) and N Vancouver under the Revised Build Alternative would increase the length and complexity of crossings and reduce safety for NB cyclists and pedestrians on N Williams south of N/NE Weidler... Closures of the crosswalk on the west side of N Williams, crossing N Broadway, and the crosswalk on the north side of NE Weidler, crossing N Williams...would introduce more complicated crossings (e.g., out-of-direction travel) on this section of N Williams... “ (pg. 94) Highway ramps are often very stressful crossing points with vehicles exiting at high speeds. The Moda Center area inherently includes large pedestrian events before and after games, concerts, and other gatherings. The area is also a heavy bike/ped thoroughfare and major transit hub. Creating an environment with more difficult crossings and detours for people walking is the opposite of what we need to be doing to move toward greater pedestrian safety and comfort.

- “Increased potential for pedestrian auto conflict due to the placement of the I-5 SB off-ramp and updated turning movements” (i.e. a double right turn lane) (pg. 97). ODOT claims that the added dangers may possibly be mitigated by signal phases and other design elements, but does not commit to any of these interventions. For a project to warrant the level of investment that ODOT is seeking, it should center pedestrian safety rather than first prioritizing high-volume high-speed traffic flow, and only then tinkering around the edges to add back some chance that people walking will be able to navigate safely. The current design violates multiple TSP policy commitments in its failure to center and commit to safe pedestrian travel.

- Closing crosswalks (West side of N Williams crossing NE Broadway,North side of NE Weidler St crossing N Williams) in a Pedestrian District moves against the goals of the TSP and standards of PedPDX.

- Removing Clackamas Crossing eliminates one of the few project elements that would otherwise improve active transportation access and safety consistent with local goals.

- Designs for the area suggest 4-lane arterials where high speeds from freeway traffic are predictable—the antithesis of a design that would center pedestrians or further climate and safety goals.
These negative impacts to pedestrian safety and comfort are notable even before considering how much ODOT is leaning on the City of Portland to contribute staff time and funding toward surface street changes and other support when those resources are urgently needed to mitigate deadly conditions in hundreds of other locations citywide. We urge PBOT not to invest time and resources in a project that clearly runs against the transportation and climate goals and policies that Portlanders have set for ourselves. The current crisis on our streets demands that PBOT, ODOT, and associated partners focus on projects that actively center safety for active modes. We urge PBOT to withdraw its support of the components of the Hybrid 3 concept that will worsen conditions for pedestrians and anyone else not in an automobile.

Tiel Jackson
Co-Chair, Portland Pedestrian Advisory Committee

Rebecca L. Sanders, PhD, RSP
Co-Chair, Portland Pedestrian Advisory Committee
December 27, 2022

To: Chris Warner, Director Portland Bureau of Transportation

Subject: I-5 Rose Quarter Supplemental Environmental Assessment (SEA) comments

“All of us in the country and literally in the world count on Portland to lead, and it is time, I think, for you to challenge some basic assumptions.” Former Mayor of Minneapolis, R.T. Rybak

The Portland Bicycle Advisory Committee (BAC) has reviewed the I-5 Rose Quarter SEA and is deeply concerned that this project fails to meet a wide variety of city, county, regional, and statewide goals. We are concerned that this project will not make conditions safer for people who want to ride bicycles, walk and take transit in Portland. The project is now rescinding a previously included walking and bicycling bridge at Clackamas Street alignment. The SEA acknowledges that conditions will be worse than prior designs. This negative outcome is out of touch with City of Portland policies that call for conditions that are safe, attractive and convenient for everyone. While the buildable highway cover is a laudable step toward restorative justice, the project would still add several lane miles of highway, compromise one of the most heavily used bikeways in the city, expand I-5’s footprint, and increase emissions including greenhouse gasses (GHG) in a marginalized community previously impacted by highway construction. As the region grows, there is no way to reduce congestion other than to have fewer vehicles on roads, dramatically lower speed limits, variable speed limits, enforcement of speed limits and more attractive walking and bicycling facilities such as the Clackamas Street bridge. Further, the two lane offramp onto NE Williams Avenue presents significant safety issues for the most vulnerable roadway users and is inconsistent with the City's design standards. Finally, by excluding any consideration of tolling in the project area and any projections of traffic volumes on I-5 and surface streets, future designs will be incongruent with reasonably foreseeable scenarios where tolling is enacted.

“[T]he relocation of the southbound ramp would worsen LTS conditions at the intersection of NE Wheeler Avenue/ N Ramsay Way/ N Williams Avenue compared to the Build Alternative and would have similar poor crossing conditions to the No-Build Alternative.” With regards to the Green Loop, “route directness in the API would be similar to the No-Build Alternative but worse than the Build Alternative without the Clackamas Bridge.” These two areas are not compatible with City policy regarding the Bicycle District overlapping the project area.

The Wheeler / Ramsay / Williams intersection does not appear to regard the safety of people walking and riding bicycles as an important consideration for this project. We are concerned about removing the bike box at Weidler leading to an increase in right hook crashes and leading to increased congestion for people riding bicycles within this intersection. We do not believe adding a one way or two way cycletrack on Weidler which already has Streetcar would be safer than an exclusive bicycle and pedestrian bridge at Clackamas Street. The Weidler cycletrack would cross Williams, an admitted LTS problem at Wheeler and Ramsay mentioned above. Portland modal hierarchy ranks pedestrian, bicycle and transit movements ahead of all others, but the cycletrack solution does not follow that hierarchy. The Clackamas Street Bridge would help mitigate the safety impacts of crossing Williams Avenue on foot or bicycle.
The Green Loop is planned to be the premier bicycle route in Portland, but it will lose its luster without the safety and comfort provided by the formerly proposed Clackamas Bridge. In addition to providing restorative justice, another intent of the City of Portland is to provide a high quality bicycle facilities and park-like experience on the Green Loop. Removing the Clackamas bridge is in direct contradiction with Portland 2035 Central City recommendation for a connection over the I-5. The bridge must remain, and the approach path must be realigned toward NE Multnomah Street until it can cross the I-5. Perhaps the overhead ODOT sign bridge between exit 302a and 301 (45.53199691950909, -122.66535046490218) can be replaced with a walking/bicycling bridge and the ODOT signs reattached (Option 1). After crossing I-5, the bridge can then return to NE Ramsay Way along the curvature of N Wheeler Ave.

Above is a conceptual idea of two options that we ask the design team to explore. There appears to be room in the polygon between Williams off ramps and Wheeler on ramps to explore option 2. In this city-designated bicycle district the 2030 Bicycle Master Plan section 2.3.1 states that “within certain dense, mixed-use areas of Portland with multiple destinations along most streets, all streets need to function well for people bicycling to or through the district.” Additional clarification is provided in section 2.3.5 on page 29, “[a]s focal points for economic, recreational and employment activities, such areas need to be exceptionally welcoming to people arriving by and traveling through by bicycle.” Clackamas bridge could provide a safer connection to Flint Avenue to further “recognize the important role of Flint Avenue as a community-oriented connection between the Rose Quarter and Lillis Albina Park.” To add even greater emphasis on bicycling and walking in the area, the installation of a bridge should not preclude the installation of a cycle track along Weidler. Nevertheless, Weidler is not a suitable or welcoming multi-use path compared to the Green Loop/Clackamas plan previously approved in the Central City 2035 Plan. A bridge, preferably an attractive one like Blumenauer, would be especially welcoming. The Revised Build
does not comply with Portland policies, plans, and priorities. Please bring back the Clackamas overcrossing.

It is puzzling that some aspects of the no build alternative are better for people riding bicycles than the revised build alternative submitted in the SEA. How will the City and FHWA endeavor to make bicycling more attractive than driving in this project?

The BAC has concerns that, while provided previously, we believe are important to identify individually:
1) Tolling must be included in this project’s analysis. This is becoming even more important given recent news that the Interstate Bridge Replacement Project has increased in cost from $3-4.8 billion to $5-7.5 billion. There is a difference between charging for road usage to regulate demand and charging to generate revenue to pay for megaprojects such as the I-5 Rose Quarter Improvement Project. With the changes to the I-5 Rose Quarter SEA from the original EA increasing the price significantly there will be more pressure to establish tolling on I-5 and I-205 to pay for these projects which would significantly impact any traffic modeling in the SEA.

2) There is insufficient space for bicycles on Williams/Vancouver based on current traffic volumes let alone future traffic volumes. Williams is a Major City Bikeway. What modes will be prioritized on the exit ramp as people walking and bicycling connect to local streets?

3) The southbound off-ramp to Williams is exceedingly unsafe for people walking and bicycling, probably the most dangerous spot for this infrastructure in the project area. It will be the most congested and require significant bicycle prioritization. How will ODOT/FHWA prioritize the safety of people riding bicycles over vehicles? The SEA suggests that “To mitigate the increased safety risk to pedestrians crossing the I-5 ramp terminals, additional traffic calming measures and modification to signal operations will be coordinated with the City during the design phase...”

4) The project area is in a city designated bicycle district meaning any transportation infrastructure must be more desirable for bicycling than other modes. Portland is an urban area, in an urban setting and therefore, there will be congestion; to think or try to design otherwise is in opposition to Metro’s climate smart strategy. We should be investing in transit and multimodal movement along parallel corridors instead. This would have huge benefits in moving the needle and have significant climate and congestion benefits.

5) Missing crosswalks undercuts assertions that this is meant to be a space for people on foot. A pedestrian district is not compatible with the number of crossings that will be missing. When crossings are missing it sends the subtle and unmistakable message that pedestrians are tolerated in an area rather than accepted and encouraged.

6) Circuitous path to get to Rose Quarter destinations increasing VMT - means more dangerous, less safe, more opportunities for crashes, red light running, etc.

7) There is no bicycle modeling. Metro has developed a bicycle model. Region 1 and other parts of ODOT should be using a bicycle model in Portland. Does ODOT have a policy to use a bicycle model or make an exception to not use one? Does the State/FHWA need to mandate the use of a bicycle model for ODOT to comply?
8) No cost estimates in over two years. With increased scope plus inflation this project could have issues with a lack of funding; excessive costs will limit capacity to improve safety on urban highways throughout the city and state. This is even more critical given the recent update announced for the Interstate Bridge Replacement project revising the prior $3-4.8 billion estimate to $5-7.5 billion even with a decrease in scope. Meanwhile the I-5 Rose Quarter project has a significantly larger scope since the last cost estimate was released and the relocation of Harriet Tubman Middle School, which was not considered before this project gained traction, means the true cost will be at least $120 million\(^1\) below what is borne by the State of Oregon.

9) The relocation of Harriet Tubman Middle School, where minority students are the majority of students, is forecast/supported by this project. We are extremely concerned about the displacement of Black children to facilitate a freeway project. This is a repeat offense, history is repeating itself. ODOT needs more lanes and Black children are in the way, so they must go. BAC fully supports restorative justice efforts by ODOT and the State of Oregon and we hope that they achieve a solution that is guided by the African American community.

10) We are confused by this statement in the project FAQ: “Nearly 99% of southbound vehicles using the I-405 Fremont Bridge exit I-5 within 2 miles, either at Broadway, I-84, or the Morrison Bridge. These three exits are all within the project area.” Broadway already has an auxiliary lane so what is the % exiting to I-84 and Morrison? Is I-405 really the culprit here? There are also on-ramps from N Greeley Ave and N Wheeler Ave onto I-5. So this leads to yet another concern: **How many other southbound vehicles using I-5 besides I-405 will exit within the 2 miles of the project area?** They will need to change lanes to the auxiliary lanes too. Will we just be creating a new bottleneck of lane changing and weaving to/from the proposed auxiliary lane?

11) Failure to analyze impact of building a lid without impacting current lane miles of I-5. Nowhere in the SEA does ODOT refer to a successful freeway tunnel in an urban area. Solving the merge problem for I-405 users will create a lane change and weaving problem for I-5 users.

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\(^1\) HB 5202-1 Amendment: Index of Sections (2022 Budget Reconciliation).
https://olis.oregonlegislature.gov/liz/2022R1/Downloads/CommitteeMeetingDocument/254502
In the figure above, we see that I-5 users will have to change lanes twice to exit at Broadway or I-84, first weaving to their right across the Morrison Bridge auxiliary lane and then changing lanes into the Greeley auxiliary lane to I-84 exit. I-5 users wishing to exit at Morrison Bridge will have to decide when to weave and change lanes, at Greeley, at 405, or after I-84 to take the Morrison bridge exit. A similar hazard will be present for northbound traffic. I-5 users will now have to change lanes twice to exit at Weidler or I-405, first weaving to their right across the I-405 auxiliary lane and then changing lanes into the I-84 auxiliary lane to Weidler exit. Northbound I-5 users wishing to exit at Greeley will have to decide when to weave and change lanes at I-84, at Weidler, or after I-405 to take the Greeley Ave exit. In the figure below we see that much of this lane changing and weaving of I-405, I-84, and I-5 will take place across three lanes in just 900 feet. There is research that shows "crash frequency is positively proportional to the number of lanes..."
on the freeway and the average daily traffic per lane on the freeway, but negatively proportional to the length of the auxiliary lane and the percentage of heavy vehicles on the freeway."²

Another study found that “if the weaving segment is followed by an entrance/exit ramp and this ramp has high traffic volume, it can be less operationally favorable to extend and terminate the auxiliary lane at this entrance/exit ramp location. Instead, dropping the auxiliary lane before this entrance/exit ramp represents a more operationally effective option.”³

A third study finds: that for an auxiliary lane diverging and merging from outside, the optimum length should be “1,000m – 1,500m and be added from around the start of vertical curve to several hundred meters beyond the end of vertical curve.”⁴ 1000m is 3280 feet, not 900’.

From a fourth study, “Providing an auxiliary lane was expected to decrease crash frequency, although this reduction appeared to be primarily in crashes that were less severe (possible injury and property damage only).”⁵

We take umbrage to this statement in the Active Transportation Supplemental Technical Report. “Because people walking and bicycling are sensitive to conditions on a more granular scale, the active transportation network’s functionality and attractiveness would largely depend on design details, which are less defined at this level of analysis. Route directness, level of stress and risk, grades, delay, and other


⁴ Effective Installation of an Auxiliary Lane at Sag Sections to Mitigate Motorway Traffic Congestion. https://www.sciencedirect.com/science/article/pii/S2352146516305452

factors would collectively inform the user’s perception.” How can the current level of design for vehicle traffic and circulation be completed without similar efforts for people walking and riding bicycles? Again, ODOT is not treating all people who use the roadway the same, instead de prioritizing the more vulnerable road users. Conflicts with vehicles for people are not a ‘perception,’ but a stark and often tragic safety reality. In fact, mentions of right hook risk have been entirely removed. In making these statements, we feel that ODOT has abandoned people who ride bicycles, people who walk, and people who take transit.

In 2019, PBOT reviewers advised the design team to use the word ‘could’ instead of ‘would’ as PBOT will need to vet and agree that people riding bicycles “would use a particular facility” as opposed to “could use a particular facility.” The word ‘would’ is still quite prevalent in the SEA. We are concerned that ODOT claims to be designing this project for an ODOT LTS 1 user and even provides a few tables (yet the “design details are less defined at this level of analysis”). We are concerned that Region 1 has not addressed the 200+ instances of events annually near Moda Center and Veterans Memorial Coliseum that generate significant pedestrian traffic near Williams and throughout the Rose Quarter. PBOT notified the design team in 2019 that Winning Way is actually Ramsay Way and yet they have failed to correct a reference to Winning Way in section 6.2.1 of the Transportation Safety Technical Report. We are concerned that this confirms the project’s focus is on the freeway, not on the local street network.

In summary 1) We would like to work with ZGF architects to ensure that the Clackamas Street bridge is built by the I-5 Rose Quarter project. 2) We need ODOT to empower and support the entire design team to respect and implement Portland standards for safety, attractiveness, and modal priority. 3) We need ODOT to make meaningful investments in sidewalks, bike lanes, public transportation, lower speed limits, variable speed limits, and speed limit enforcement that will make the area safer for all people using the roadway, especially the most vulnerable ones. We need these investments to be THE priority, far and away higher than a limited widening solution.

Respectfully,

Joseph Perez
Vice Chairperson
Portland Bicycle Advisory Committee

David Stein
Member, Former Chairperson
Portland Bicycle Advisory Committee

Member and BAC Liaison
PBOT Bureau Budget Advisory Committee

Cc: Sharon Daleo, PBOT
December 13, 2022

To: Chris Warner, Director Portland Bureau of Transportation

Subject: I-5 Rose Quarter Supplemental Environmental Assessment (SEA) comment

On behalf of the Portland Freight Committee (PFC), we are submitting the following testimony in support of ODOT’s I-5 Rose Quarter Improvement Project, for which the Federal Highway Administration published the Supplemental Environmental Assessment (SEA), in accordance with NEPA, that examines the environmental effects associated with the updated “Hybrid 3” highway cover design.

The Rose Quarter area is one of the top 100 traffic-clogging bottlenecks of the freight industry in the country. Moreover, it represents one of the two major bottlenecks listed by the American Transportation Research Institute for the State of Oregon. Therefore, we want to stress the importance of this project to the movement of goods for our region at this major freeway interchange area.

We also recognize and appreciate the additional community outreach completed as part of the Independent Cover Assessment work as directed by the Oregon Transportation Commission and support the resulting updated project concept to provide a larger cover over the highway and restore the local street grid in the project area.

Questions to be answered include if there are substantial changes to freight travel patterns and what infrastructure considerations are necessary for the streets and intersections providing local connections in the area. Thus, we want to stretch the need to understand the freight operational needs better to inform the appropriate design that accommodates the freight demand flows in both the interstate and the local routes. We encourage ODOT to address the following topics:

1. Design considerations (i.e., geometric approaches, slopes, vertical clearances, alignments, and turning radii) that support the efficient and safe movement of freight while balancing the needs of a multi-modal transportation network.
2. Comprehensive outreach to the freight community to capture better what over-dimensional load, heavy freight, local delivery, and temporal patterns are inherent in this area.
3. The associated impacts to travel time and local movement for freight operations related to the relocation of the I-5 southbound off-ramps from Broadway further south to N. Wheeler Ave and circulation change based on the highway cover design, including:
   a. Broadway and Weidler are the designated freight routes. However, the proposed design requires the usage of Wheeler and N Williams Ave, both local service truck streets not designed to accommodate major freight volumes. Thus, we encourage ODOT to evaluate what infrastructure changes are required based on the new travel patterns.
   b. Geometric design of the SB exit ramp at Williams. The SEA materials show a sharp turning radius for this connection that could negatively impact trucking operations and increase conflict between freight and other road users.

4. Implications related to increased vehicle traffic on local streets as a result of tolling or the reconfigurations of the interstate or to the local connection associated with this project or the IBR project.

5. Regional project coordination between ODOT and their regional partners for the IBR and Rose Quarter project.

6. Earthquake resilience design considerations in particular for the upgraded lid over the i-5.

The Portland Freight Committee strongly supports these critical regional transportation projects, and we look forward to helping your efforts in advancing these projects to completion.

Respectfully yours,

[Signature]
Jana Jarvis
Chair
Portland Freight Committee

Cc: Sharon Daleo, PBOT
DATE: January 4, 2023
TO: PBOT - Caitlin Reff & Sharon Daleo
FROM: Portland Historic Landmarks Commission and Design Commission
RE: I-5 Rose Quarter Project & Supplemental Environmental Assessment

The Portland Historic Landmarks Commission (HLC) together with the Portland Design Commission (DC) received briefings on the I-5 Rose Quarter project from the Oregon Department of Transportation (ODOT) on December 12, 2022 and December 15, 2022, respectively. Projects of this scale, like the original interstate freeway project, are rare in the history of development in Portland. Like past infrastructure projects across the United States, the burden of demolition and destruction required to build the I-5 freeway through NE Portland in 1966 was carried predominantly by Portland’s black community. The Supplemental Environmental Assessment report and presentation from ODOT to our Commissions documents an entire black neighborhood being leveled. As such, few resources remain from an historical era and geographic location important to Portland’s African American community. Above and beyond our duty to protect what little is left of the traces of that neighborhood is an obligation to consider some broader themes that relate to our City-wide Comprehensive Plan.

Both commissions applaud the rigorous process the agencies and design teams have engaged in including the Independent Cover Assessment and subsequent outreach conducted by Historic Albina Advisory Board (HAAB). These efforts have resulted in a project concept that supports community redevelopment, reconnection, safety and an enriched public realm for neighborhood residents, businesses and visitors. The Portland Historic Landmarks Commission and the Portland Design Commission support the proposed I-5 Rose Quarter Hybrid 3 cover concept. We acknowledge it is the preferred design option and will serve to remedy past harms to both the community and the urban fabric of the City.

As noted above, the background and material provided in the presentation was very informative and helpful in understanding the large infrastructure project. However, given the scale, a second briefing with the Design Commission to provide more detailed feedback is requested. A second briefing will certainly help to provide a smooth and predictable process for the Design Review elements and additional input to supplement the feedback ODOT is receiving from other City Committees and Commissions. Given the pace of the project a second briefing in January or February seems appropriate. Details of this request can be found in Sections 2 and 3 below.

Our recommendations to you are to consider evaluating the design proposal in the context of (1) Repairing Past Harm, (2) Urban Design Aesthetic and Quality, (3) Transportation System Connections and (4) Climate Resilience.

1. **Repairing past harm**
   - It is important that the process has been robust and flexible. As the process continues, community desires should be prioritized in funding decisions.
   - The Commissions understand that the lid structures to be built over I-5 may not be appropriate for ownership in the same way a parcel of land could be owned by a private owner. However, there are currently small, irregular parcels of land on either side of the highway that are in public ownership (ODOT rights-of-way). We strongly advocate for these buildable parcels to be returned to private ownership, and specifically given- or sold for a below-market price- to the minority communities that lived in lower Albina prior to the construction of I-5 and the Veteran’s Memorial Coliseum. Although a
mechanism to do this would have to be carefully considered, the ownership of these parcels could begin to address the losses the BIPOC community endured and allow for future wealth-building. There are precedents for development over highways and transit tunnels using air rights agreements and long-term building pad leases.

- Future buildings that can be supported on actual, at-grade parcels of land (see above bullet point) should also be created where feasible.

- ODOT’s remnant at-grade properties, next to the developable lids, should be packaged with the lids to enhance the feasibility for development for the combined parcels. Additional outreach to the HAAB may be needed to ensure this approach aligns with the scope and projects identified in the Independent Cover Assessment.

- St. Philip the Deacon Episcopal Church is an important resource in Albina. The Landmarks Commission strongly encourages that it be added to the list of churches in the “Pillars of Albina” list of places, people, events, or industries important to the African American experience in Oregon.

- As one of the few remaining historic buildings in the vicinity of I-5, the Landmarks Commission strongly encourages discussion with the owners of the Left Bank building, so as to potentially list it on the National Register of Historic Places as part of the project.

- “Wall 15” and other surfaces are opportunities for more local black artists and designers.

- Consider ways to celebrate and express the legacy of jazz, and music in general, in the design of embellishments and open spaces as both are relevant to the cultural history of the Albina neighborhood.

2. Urban Design Aesthetic and Quality

- A high level of urban design and attention to detail will be required to weave the new urban fabric back into the old patterns. Placemaking will only be successful if it can go beyond the physical, structural and traffic connection requirements. How all the infrastructure treatments fit together in an overall, coherent urban design concept (spatial location, integration, and detailed design) is critical. To that end, the Design Commission requests:

  - A second briefing in the near future, January or February given the pace of the project, to discuss more detailed information on the embellishments and the urban design elements of the project at both highway and neighborhood-levels. The information provided in the presentation was small and difficult to read and a document that graphically highlights the urban design elements of the project, including plans and cross sections, is needed.

  - A future third briefing that focuses on the Community Framework Agreement and the highway cover development. This briefing needs to occur at the next design milestone for the highway cover that reflects the outcome of the Community Framework Agreement. Summer of 2023 was identified by ODOT and the Bureau of Planning and Sustainability as the appropriate time. Items for this briefing to include development parcel size, configuration, on-grade, and on-structure parcels (including location of major structure joint between on-grade and on-structure), block frontages with development edges, open space or open highway structure edges, and massing.

- The project needs to designate a budget to elevate the design so that it is more about Portland and not “anywhere” infrastructure. Areas to focus on include:

  - Elevate the portal designs as one passes from open highway to covered highway.

  - At portals and arrival points look for opportunities to express a sense of arrival in Albina. Focus on “telescoping” the project up through the structure at the portals and at off-ramps.

  - Connecting the edge of the deck to adjacent properties and allowing for unique opportunities for the public to occupy edges and see views.
Celebrate the structure. Right now, it is a harsh concrete deck and there are opportunities to celebrate it as a healing intervention.

Street-level embellishments should be prioritized over highway-level treatments.

- The Design Commission notes that large expanses of concrete walls, such as “Wall 15”:
  - Should be minimized to avoid another sea of concrete.
  - Large walls could be terraced to provide room for landscape treatments, however, terracing could increase the footprint of the highway, potentially reducing the size of development parcels flanking the ODOT ROW. An attractive corridor that maximizes both on-grade and on-structure development parcels is the goal.
  - The designs should include changes in plane, details at different scales and culturally meaningful motifs.

- I-5 in the Rose Quarter area was unfortunately not constructed exactly parallel to Wheeler Avenue and the grid west of it along the river, but it may be close enough to that angle so that it will be perceived as the same, once development occurs on the highway lids. The Landmarks Commission strongly encourages the recognition of the two older street grids in the development of the highway covers. Because of the two street grids coming together in this area, development on the new highway covers might be appropriate with two slightly different approaches. The western side of the highway covers will face the river grid and could be developed as angled buildings at the inflection point. The eastern side, however, may be more appropriate as orthogonal buildings, facing the more predominant street grid.

- Durability, vandal-resistance, vandal access prevention to visible surfaces, ease of replacement or repair – are critical for all design elements; future maintenance will be minimal, and Portland has a significant graffiti problem on both private and public property.

- Ensure that the cost of highway cover(s) result in economically feasible development parcels.

- Ensure successful, lively, inviting public open space – location, adjacent uses, access, solar orientation, active programming, character of detailed treatments, etc. – are all critical.

- Support Title 33 Zoning Code Amendments to allow commercial development on future created parcels over and along the existing highway.

- As a footnote to our agency partners, the Design Commission, whether in a statutory land use review for a development proposal or in a courtesy, advisory review for major public works, uses the Central City Fundamental Design Guidelines (CCFDG) as our basis of evaluation and recommendation. Three major chapters of the CCFDGs are Context, Public Realm and Quality and Permanence. You’ll find the language of those guidelines entirely relevant to the I-5 Rose Quarter Project.

3. **Transportation System Connections**

- The Green Loop as it crosses I-5 is an important part of the design and an important part of the project. The Landmarks Commission notes that the lack of street trees or development for several blocks next to I-5 on these streets is hardly conducive to pedestrian or bike traffic. At a minimum, street trees are critical for the Green Loop to be inviting, and the pattern of trees must extend into the lid design. There are technical ways to integrate at-grade street trees on the local streets crossing the cover, using precast boxes nested between girders. Street trees, streetlights, furnishings in normal urban sidewalk configuration will be essential to giving continuity of the neighborhood fabric as it crosses the cover east to west.

- It will be important to address the Vancouver Avenue intersection with Broadway as it is currently dangerous for pedestrians and bicyclists.
• As noted in Section 2 above, a second briefing in January or February is requested for the Design Commission to provide guidance on the local transportation system. Additional information requested includes:
  - Surface street/intersection/block pattern concept within project area.
  - ROW widths, sidewalk width, intersection crossings (signalized/unsignalized), corner radii, pedestrian/bike facilities.
  - Local street design character: urban tree canopy, lighting, furnishings including public art, such as monuments.

4. **Climate**

• Mitigation for the negative climate aspects of using a significant amount of concrete in the project might include encouraging white or light-colored surfaces especially at surfaces facing the sun, planning for tree wells and other planters to provide greenery, and to consider shade at the pedestrian realm as a critical design consideration.

• Additionally, innovative concrete mixes that reduce carbon like fly-ash, geopolymers and graphene should be investigated. This project is one that can not only be less impactful on the environment but can also contribute to Portland’s reputation for being ahead of many American cities in terms of transportation and sustainability.

Portland will have few opportunities to make such a significant correction to a historical injustice. The chance to reshape and repair an entire inner-city neighborhood with all the intention of the community fully expressed in the outcome should not be missed. A vision of more than a freeway improvement project has been presented. It is based on a broad spectrum of community engagement. What is needed is further investment by the City of Portland for the duration of the project to ensure we get more than an infrastructure project but rather a chance to address a number of our comprehensive plan goals. We can turn a highway widening project into a place making endeavor where the end result makes a statement about our values and the importance of good civic spaces for all communities.

In closing, both the HLC and DC compliment the agencies and design team for the progress to-date and look forward to reviewing more developed designs in the near future and in the summer of 2023 at the next design milestone.

Sincerely,

The Historic Landmarks Commission and the Design Commission

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CC: Rebecca Esau, Director of BDS
    Troy Doss, BPS
    Design & Historic Review Team of BDS

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