

K19071 I-5 Rose Quarter Improvement Project Administrative Public SEA

City of Portland Review Log

Comments Due: 12/27/2022

Agency Reviewer

Comment No.	Reviewer Name	Bureau	Date	Document	Page #	Line#	Comment
1	Morgan Steele	BDS	12.07.2022	SEA App D	D-10	Water Resources	Compliance with CoP's Title 10 and the Erosion and Sediment Control Manual should be added here.
2	Roger Geller	PBOT	12.09.2022	SEA 3.8.2.1		52	<p>Below comment in response to this statement: "...the City would be unable to implement the goal of supporting high-density, mixed-use development with safer and greater pedestrian and bicycle connectivity..."</p> <p>This seems to imply that City would be unable to provide "safer and greater" conditions for bicycling without this project. This is untrue.</p> <p>There needs to be careful consideration between the no-build and revised scenarios for how they impact bicycle transportation, 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 appropriate for creating conditions that minimize delay and accommodate large volumes of cyclists [Portland Transportation System Plan; Major City Bikeways Classification description]. It creates 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].</p> <p>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 policies remains a strong possibility. Indeed, desire for similar improvements on other parts of the plan are eliciting 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 dense with walking, biking and transit.</p> <p>There does not appear to exist a good mechanism by which 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.</p> <p>Similarly, N 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 egress 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 egress provided by North Williams. With limited space, the introduction of freeway ramp traffic to the corridor, and protected signal phasing at Weidler Street it appears that conditions for transit will deteriorate, which is at odds with city policy.</p>
3	Roger Geller	PBOT	12.09.2022	SEA 3.8.2.2		56	<p>While the revised build scenario would seem to superficially meet some policies for the Lloyd District found within the Central City 2035 plan—at the least the project seems to not egregiously violate them—the scenario still misses the overall thrust of those policies for the district. Policy 5.LD-3 discourages new automobile-oriented uses and encourages surface lot development the enhances the pedestrian environment. Policy 3.4 expresses the desire to manage Central City transportation so as to prioritize modes other than the automobile to accommodate travel demand. Similarly, the project obviates 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].</p> <p>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 Central City because of 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 Draft 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.</p> <p>The Revised Build scenario posits that the Green Loop will run along NE Broadway and Weidler 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 a multi-use path, include a connected canopy, 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 Weidler. Those corridors will be constrained by available width and will also have to fulfill their roles as Major City Bikeways. As Major City Bikeways, these corridors are also principal commute 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 available width that does not seem present in the Revised Hybrid design.</p>
4	Roger Geller	PBOT	12.09.2022	SEA 3.8.2.1		52	<p>Below comment in response to: "...the No-Build Alternative would have an adverse effect on the City of Portland's long-term vision for land development within the API..."</p> <p>This is presumably based on not achieving the realization of the Central City Multimodal Mixed Use Area (MMA) and the subsequent need to apply long-established TPR requirements for automobile congestion. However it's not clear that ODOT's written concurrence is required for an MMA designation that is more than one-quarter mile of any interchange ramp ["Portland Central City Multimodal Mixed Use Area 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 so long as they were more than five blocks away from the interchange ramps.</p> <p>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 freeways. 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.</p>
5	Roger Geller	PBOT	12.09.2022	SEA 3.8.2.3		56	<p>Below is in response to: "Because the Revised Build Alternative complies with the City of Portland comprehensive plan..."</p> <p>It is not clear that the Revised Build does fully comply with city policies. 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 9.21 and 9.20, 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].</p>
6	Roger Geller	PBOT	12.09.2022	SEA 1.4		4	<p>Below in response to: "Between 2011 and 2015, there were 268 crashes on the local street network in the Project Area"</p> <p>This does not paint an accurate picture of the crash scenario. Extend this comparison to consider PDO v A and B crashes and fatal crashes. Extend that comparison to the 881 crashes on the highway system, too. Only by assessing the quality of the crashes can we adequately assess need.</p>
7	Roger Geller	PBOT	12.09.2022	SEA 1.5		5	<p>Below comment in response to: "Goals may be carried forward beyond the NEPA process..."</p> <p>What does this mean? Is it typical that goals are not carried forward beyond the NEPA process? What would that look like?</p>

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City of Portland Review Log

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Agency Reviewer

Comment No.	Reviewer Name	Bureau	Date	Document	Page #	Line#	Comment
8	Roger Geller	PBOT	12.09.2022	SEA 2.2.1		12	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? Is "planned actions with committed funding in the project area" the federal test for what to include in the No-Build, or is that just adopted practice? What about initiatives being developed and otherwise in process (ie, tolling/congestion pricing)?
9	Roger Geller	PBOT	12.09.2022	SEA Figure 2-6		17	Below comment in response to Figure 2-6: "I-5 Cross Section (N/NE Weidler overcrossing) Proposed Improvements" Is this showing the same location as that in Figure 2.2? 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 12' shoulders would be approximately the width of a freeway travel lane. Revise cross-section to make more visually accurate and a direct comparison to previous image. Otherwise it's misleading. Very small note says it's not to scale. It's easy enough to create a scaled drawing. Why not do so? Also, to make the document/comparison user friendly, stack the images so they are on the same page.
10	Roger Geller	PBOT	12.09.2022	SEA Figure 2-7		19	Below in response to Figure 2-7: Building Parameters on the Cover Legend says that "Up to 6-story lightweight buildings could 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 strong desire of the community the project is attempting to serve, it would be good to understand the implication of "design modifications" to "roadway profiles."
11	Roger Geller	PBOT	12.09.2022	SEA 2.2.2.5		24	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	Roger Geller	PBOT	12.09.2022	SEA 2.2.2.7		26	This section doesn't discuss improvements to Williams between Multnomah and Ramsay. Why is that omitted?
13	Roger Geller	PBOT	12.09.2022	SEA 3.2.2.2		29	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 irons out the kinks in the existing system, wouldn't that have the effect of increasing capacity. While the project may not recognize "induced demand" it is an important consideration for many road authorities. Understanding the potential for increased capacity seems a necessary step in being able to compare the two options.
14	Roger Geller	PBOT	12.09.2022	SEA 3.3.2.2		34	Below comment in response to: "The Revised Build Alternative would not substantially improve highway capacity and is not expected to induce growth or create other effects that would cause indirect impacts." What is the basis for this expectation? This needs to be analyzed from the perspective of potential induced demand.
15	Nick Falbo	PBOT	12.12.2022	SEA Exec Summary	ES-7		The executive summary lists as an anticipated benefit: "Improved traffic operations on the local street system and the addition of newpedestrian and bicycle enhancements would provide benefits to the local business environment." It is unclear if the revised build alternative would improve operations on the local system. The relocation of the SB oftamp to Ramsay Way seems to complicate the local street system with added freeway access circulation needs.
16	Nick Falbo	PBOT	12.12.2022	SEA 3.13.2.2		91	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 Crossin included in the 2019 Build Alternative. The Clackamas Crossing proposal had a strong policy support as a key recommendation in the I-5 Broadway/Weidler Facility Plan adopted by resolution 36972 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	Gena Gastaldi	PBOT	12.12.2022	SEA 1.2		2	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 modes, 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 crash for pedestrians. (https://www.portland.gov/transportation/vision-zero/high-crash-network)
18	Gena Gastaldi	PBOT	12.12.2022	SEA 2.2.2.5		25, 94	Closing crosswalks in a Pedestrian District isn't best practice and doesn't advance the goals of The TSP or PedPDX. Policy 9.19 or the TSP states "improve pedestrian safety, accessibility, and convenience for people of all ages and abilities". Closing crosswalks forces out of direction travel for pedestrians.
19	Nick Falbo	PBOT	12.12.2022	SEA 3.8.2.2		56	This section states that the Revised Build Alternative "is compliant with policies identified in the Adopted Central City 2035 Plan (2018) 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	Nick Falbo	PBOT	12.12.2022	AT Supplemental TR		4; 23	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	Gena Gastaldi	PBOT	12.13.2022	SEA 3.13.1.2		86	There are additional streets with crossing gaps (Flint, Wheeler, Multnomah), as well as a few deficient crossings (see PedPDX maps for more info)
22	Gena Gastaldi	PBOT	12.13.2022	SEA 3.13.2.2		94	TSP Policies 9.6 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	Gena Gastaldi	PBOT	12.13.2022	SEA 3.13.2.2		96	Where is the discussion on the removal of the Clackamas Crossing and the impacts of that decision on pedestrian connectivity?
24	Gena Gastaldi	PBOT	12.13.2022	SEA 3.13.2.2		96	Any benefit to connectivity from filling sidewalk gaps on Wheeler/Williams will be cancelled out by the freeway off ramp landing at that location.
25	Gena Gastaldi	PBOT	12.13.2022	SEA 3.13.2.2		96-97	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 I-5 SB off ramp". This is unacceptable and clearly defies TSP 9.6 and 9.19.
26	Gena Gastaldi	PBOT	12.13.2022	SEA 3.13.2.2		97	SEA says that conditions would be improved by reducing element, such as crossing 6 travel lanes... What is this referring to?
27	Gena Gastaldi	PBOT	12.13.2022	SEA 3.13.2.2		97	Reference PBOT Lighting Guidelines
28	Gena Gastaldi	PBOT	12.13.2022	SEA 3.13.2.2		100	Vision clearance should be reviewed for all intersections, not just uncontrolled. https://www.portland.gov/sites/default/files/2022/lw_004-vision-clearance-directive-2020-01-09.pdf
29	Lisa Strader	PBOT	12.14.2022	AT Supplemental TR		Figure 4, Page 14	Removing crosswalk at NE Broadway is in conflict with City priority for pedestrians as stated in our TSP and PedPDX. Removing the Clackamas Crossing has the same negative impact on pedestrians.
30	Lisa Strader	PBOT	12.14.2022	AT Supplemental TR		Page 19	Temporary construction impacts to AT are understandable. Clear, consistent, well-maintained wayfinding and communication through social media and to CBO's will be very important to ensure pedestrian and cyclist safety.

K19071 I-5 Rose Quarter Improvement Project Administrative Public SEA

City of Portland Review Log

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Agency Reviewer

Comment No.	Reviewer Name	Bureau	Date	Document	Page #	Line#	Comment
31	Gena Gastaldi	PBOT	12.14.2022	AT Supplemental TR	4		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.
32	Gena Gastaldi	PBOT	12.14.2022	AT Supplemental TR	18		The updated PedPDX 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.
33	Gena Gastaldi	PBOT	12.14.2022	AT Supplemental TR	18		The entire last paragraph is inaccurate. PedPDX 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 1 - 5 (not 3 as the document states).
34	Gena Gastaldi	PBOT	12.14.2022	AT Supplemental TR	24		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 4 lanes. I fail to see how this design reduces pedestrian crossing widths and increases comfort.
35	Gena Gastaldi	PBOT	12.14.2022	AT Supplemental TR	24		Noting lack of street trees in the cross sections.
36	Gena Gastaldi	PBOT	12.14.2022	AT Supplemental TR	26		"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 PedPDX plan." Again, I have no idea what this is referring to. This is inaccurate. Broadway Weidler are Major City Walkways and on 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.
37	Gena Gastaldi	PBOT	12.14.2022	AT Supplemental TR	46		"The conditions for walking in the area 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 improvements would occur along with slightly increased grades and the loss of two crosswalk street crossings and outweigh the adverse effects of those changes" This paragraph fails to take 2 things into account: the loss of the Clackamas Crossing and the addition of the I5 off ramp at the Moda Center.
38	Lisa Strader	PBOT	12.15.2022	AT Supplemental TR	23		As noted at the start of the Moda section, the Clackamas Crossing was part of the 2035 plan. Its elimination and replacement with access via 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. Williams 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 parking in the vicinity but away from the immediate area.
39	Lisa Strader	PBOT	12.15.2022	AT Supplemental TR	24		Reinforcing Gena's comment above about not seeing the reduced crossing distances based on the cross sections showing 4 and 5 lanes of vehicle/transit traffic.
40	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	3		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. Indeed, there are multiple notes and drawings from that earlier design demonstrating that raised facilities were to be provided.
41	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	3		Regarding "These impacts are both positive and negative but not substantial": The changes to N Williams resulting from it being the channel for southbound I5 off-ramp traffic, are substantial, as described in subsequent comments
42	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	4		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. Bicycle crossings also become more complex, especially for the major bikeway flow that is northbound on Williams. 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. Inclusion of freeway off-ramp traffic onto N Williams will challenge the ability to create sufficient storage for both the northbound flow of cyclists from further south on Williams as well as for the eastbound to northbound flow of cyclists approaching the Williams-Weidler intersection from the west. This lack of adequate storage in 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 bicycling will be able to 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 N Williams corridor between Ramsay and Broadway. This will create challenging conditions for people bicycling to make the necessary maneuvers to avoid conflicting automotive traffic at Williams Weidler, to avoid the traffic accessing the northbound I5 on ramp on the left side of Williams north of Broadway and to then gain access to the existing left-running bicycle lane on Williams 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 N Williams.
43	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	4		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.
44	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	4		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 scenarios on this point.
45	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	12		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 "could provide an opportunity").
46	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	12		Regarding "Construct wider sidewalks and bike lanes at sidewalk level...": As noted elsewhere, sidewalks and bike lanes of specific width based on roadway classification and expected use volumes 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 is introducing higher volumes of automobile 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.

K19071 I-5 Rose Quarter Improvement Project Administrative Public SEA

City of Portland Review Log

Comments Due: 12/27/2022

Agency Reviewer

Comment No.	Reviewer Name	Bureau	Date	Document	Page #	Line#	Comment
47	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	13		Regarding: "Remove the two-way cycle track on N Williams Avenue....": These elements remain part of the design discussion. It doesn't seem appropriate to call them out here with this level of specificity.
48	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	14,21	Figure 4	Regarding map callout: "Upgrade to physically separated and raised bike facilities....": Again, this is not an upgrade as physically separated and raised bicycle lanes would have been a City of Portland requirement in the Build scenario, too.
49	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	15		The Oregon HDM was recently updated to incorporate into it the Blueprint for Urban Design, which specifically addresses designs for travel lanes, sidewalks and bike lanes.
50	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	15		Regarding "City of Portland Protected Bicycle Lane Planning and Design Guidance": This is one Portland Guide, unchanged since the Build scenario, that identifies sidewalk-level protected bicycle lanes as the preferred design.
51	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	16		Regarding "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.
52	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	16		Regarding "The mission of PedPDX....": This seems an odd document to highlight. City Policy is stronger and very clear. City Policy 9.6 states that the city of Portland is to "implement a prioritization of modes for people movement by making transportation system decisions according to the following ordered list: 1. Walking 2. Bicycling 3. Transit 4. Fleets of electric, fully automated, multiple passenger vehicles 5. Other shared vehicles 6. Low or no occupancy vehicles, fossil-fueled non-transit vehicles" The Comprehensive Plan also states: "Create conditions that make bicycling more attractive than driving for most trips of approximately three miles or less." (Policy 9.20); "Create more complete networks of pedestrian facilities, and improve the quality of the pedestrian environment." (Policy 9.18); "Encourage walking as the most attractive mode of transportation for most short trips, within neighborhoods and to centers, corridors, and major destinations, and as a means for accessing transit." (Policy 9.17); "Create a bicycle transportation system that is safe, comfortable, and accessible to people of all ages and abilities." (Policy 9.21); and, "Coordinate with public transit agencies to create conditions that make transit the preferred mode of travel for trips that are not made by walking or bicycling." (Policy 9.22). These seem equally if not more relevant than sole reference to PedPDX.
53	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	18		Regarding the "Affected Environment": Likely this was covered in the 2019 TR, 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 couplet is a major bicycle corridor between the Steel Bridge to points north of the API. It is one of the busiest corridors in the city for bicycle transportation. Both roadways are classified as Major City Bikeways. Broadway-Weidler are similarly classified as Major City Bikeways, though they carry lower bicycle volumes than Vancouver-Williams. The north south corridor also carries two bus lines, including one that is frequent service.
54	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	21		Regarding "The Revised Build Alternative would accommodate bicyclists....": 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.
55	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	22		Regarding: "The I-5 southbound offramp would be relocated....": This relocation introduces freeway off-ramp traffic onto a major bicycle corridor that also serves two transit lines, one of which is a frequent service line. This adds complexity and risk 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-Weidler intersection is especially challenging as it receives significant flows of people biking both eastbound and northbound. The additional automobile pressure on the N Williams corridor between Ramsay and Broadway because of this off ramp will significantly complicate bicycle movements. It is likely to introduce delay for people biking, walking and using transit (in contravention of Portland polices) and will likely create conditions that are not as comfortable as conditions under both the No Build and Build scenarios.
56	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	22		Regarding "NE Weidler Street" and bike signals: This signal is necessitated by the 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 with the No Build or Build scenarios. This signal is also likely to introduce increased delay for people bicycling relative to the other scenarios.
57	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	22		The signal at N Hancock Street is similarly likely to introduce 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.
58	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	23		Regarding: "Compared to planned I-5 crossing of NE Clackamas Street,....": 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 sidewalk-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.
59	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	24	Figure 6	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.

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Agency Reviewer

Comment No.	Reviewer Name	Bureau	Date	Document	Page #	Line#	Comment
60	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	31-36	Table 2	<p>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.</p> <p>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 Plan/Interchange Area Management Plans" for project development or development review.</p> <p>This is too blunt of a tool to provide meaningful information for these intersections. Indeed, it serves to distract from the level of detailed analysis and consideration required for those intersections and segments that will experience the most change in automobile volumes. Indeed, 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.</p> <p>In addition, ODOT's guidance in their Analysis Procedures Manual differs significantly from the city's. The ODOT manual suggests that "Bicycle facilities with greater separation from vehicles rate higher than shared or lesser separated facilities. Wider 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...." PBOT's guidance is clear that protected lanes are required at volumes greater than 6000 ADT and at 95th% speeds greater than 26 mph. However, it also calls for protected lanes as appropriate at volumes as low as 1500 ADT, depending on conditions. By city policy and design guidance protected lanes are always the preferred treatment whenever separation is called for.</p> <p>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 they use is a modified version of what had initially been reported in 2012 in a Minetta 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.</p> <p>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.</p>
61	Roger Geller	PBOT	12.16.2022	AT Supplemental TR		36	<p>Regarding "12 Williams....13 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 N Williams between Weidler and Broadway and between Broadway to Hancock highlights the insufficiency of this tool to provide meaningful information.</p> <p>Existing conditions on N Williams between Weidler and Broadway are favorable for bicycling. The northbound movement from Williams between Weidler and Broadway currently carries mostly bicycle traffic. Thus, when northbound Williams traffic at Weidler 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.</p> <p>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.</p> <p>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.</p> <p>On Williams between Broadway to Hancock people bicycling may similarly be delayed as under some design scenarios they will be required to shift from one side of the roadway to the other at a signalized intersection. Neither the No Build nor the Build conditions requires that shift and resulting delay.</p> <p>These are examples of how the blunt tool that is the LTS analysis fails to identify the true nature of differences between the scenarios.</p>
62	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	38-41	Table 5	<p>Regarding Broadway Bridge t/from Williams/Vancouver...and Tillamook...": Not included as a criterion here is whether the high volumes of people bicycling east to north can be accommodated at the Williams-Weidler intersection. Portland policies are explicit about the ability of Major City Bikeways to accommodate large volumes of bicyclists.</p> <p>Based on ongoing conversations, it is not clear that current and future volumes can be easily accommodated.</p>
63	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	38-41	Table 5	<p>Regarding "All four study intersections" (Broadway Bridge to/from Lloyd eastbound): With signalization of nbnd off ramp right turn onto Weidler I would say that intersection improves.</p>
64	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	38-41	Table 5	<p>Regarding Broadway Bridge to/from Lloyd (Eastbound): Delay for eastbound cyclists is likely to increase due to additional signal phases at Williams-Weidler intersection.</p>
65	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	38-41	Table 5	<p>Regarding "No change from the primary No-Build Route (Broadway Bridge to/from Broadway/Weidler...east of I-5): More traffic pressure on Williams-Weidler intersection is likely to increase delay for people bicycling eastbound due to more signal phasing and timing for northbound movements.</p>
66	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	38-41	Table 5	<p>Regarding "All four study intersections..." (Steel Bridge...to/from Williams/Vancouver corridor...": and regarding "Both study intersections..." (Steel Bridge...to/from Broadway/Weidler corridor...east of I-5...)" Blocks between Ramsay and Broadway will see increased automobile traffic due to relocation of southbound off ramp. Increased traffic will have many potential effects, including a more physically intimidating environment, increased delay due to signal timing and possible transitioning from one side of the roadway to another, increased exposure to high volumes of freeway off-ramp traffic, and insufficient storage at the Williams-Weidler intersection.</p>
67	Roger Geller	PBOT	12.16.2022	AT Supplemental TR		42	<p>Regarding "Eastbound cyclists would have increased separation...": Conditions for the Build alternative would be the same as for the Revised Build as city standards for bikeways would have required sidewalk level facilities.</p>
68	Roger Geller	PBOT	12.16.2022	AT Supplemental TR		43	<p>Regarding Route 2 and 3 Cyclists: Eastbound cyclists will likely experience increased delay due to signal timing at the Weidler-Williams intersection. The intersection with the northbound off ramp is likely to be signaled and operated with "No Turn on Red", which is better than the No Build condition where a right-turn slip lane would be maintained.</p>
69	Roger Geller	PBOT	12.16.2022	AT Supplemental TR		44	<p>Regarding Route 4 Cyclists "...but more separation...": The only reason more separation is needed in this segment is because of the freeway off ramp traffic. Existing facilities are sufficient for current levels of traffic as well as for levels of traffic that would occur in both the No Build and Build scenarios.</p> <p>While the quality of the facilities will improve, the conditions are still likely to degrade because of the presence of freeway off ramp traffic, increased delay at Weidler-Williams, the potential need to switch sides of the roadway multiple times and inability to handle large volumes of people bicycling.</p>

K19071 I-5 Rose Quarter Improvement Project Administrative Public SEA

City of Portland Review Log

Comments Due: 12/27/2022

Agency Reviewer

Comment No.	Reviewer Name	Bureau	Date	Document	Page #	Line#	Comment
70	Roger Geller	PBOT	12.16.2022	AT Supplemental TR	46		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 it is difficult to see how conditions for bicycling in the Revised 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.
71	Lisa Strader	PBOT	12.19.2022	AT Supplemental TR	36		As this summary identifies, and as represented in more detail in tables on previous pages, the LTS for pedestrians on N.Williams between Ramsey Way and Wiedler is twice as back as the No Build option. 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.
72	Lisa Strader	PBOT	12.19.2022	AT Supplemental TR	44		Pedestrian conditions at the N. Williams/NE Weidler intersection are acknowledged as being difficult under the RBA. This doesn't support city policies that prioritize pedestrians.
73	Lisa Strader	PBOT	12.19.2022	AT Supplemental TR	46		"slightly increased grades" can be a significant impact to mobility device users.
74	Lisa Strader	PBOT	12.19.2022	AT Supplemental TR	47		The cumulative impact of eliminating the Clackamas Crossing and adding the I-5 SB off-ramp at Williams are significantly negative to pedestrians, including people with disabilities, and are in conflict with city policies that prioritize pedestrian movement and safety.
75	Lisa Strader	PBOT	12.19.2022	SEA 2.2.2.7	26		Closing crosswalks for traffic operations is in conflict with city policies.
76	Lisa Strader	PBOT	12.19.2022	SEA 2.2.2.7	26		In the Other Local Street, Bicycle, and Pedestrian Improvements section, 800 feet of sidewalk infill is mentioned and tied to ADA-accessible crossings. I am unclear where the infill locations are and complete sidewalk networks do benefit people with disabilities but unless the locations are at corners or there will be mid-block crossings, saying there are ADA-accessible crossing benefits seems inaccurate.
77	Jason Grassman	PBOT	12.19.2022	AT SUPPLEMENTAL TR		Appendix A	I don't know if the TR needs to be changed but the I-5 SB off ramp connection needs to be revisited, the right turn radius cannot support two design vehicles. Perhaps the left off-ramp lane can go westbound on Ramsay.
78	Lisa Strader	PBOT	12.19.2022	SEA 3.13.2.2		94	This section acknowledges that the relocated off ramp and crosswalk closures will reduce pedestrian safety. This is in conflict with city guidance and plans.
79	Lisa Strader	PBOT	12.19.2022	SEA 3.13.2.2		96	This section again acknowledges pedestrian safety issues with the off ramp and crosswalk closures including recognition for more vehicle/pedestrian conflicts. City staff agree. Portland guidance prioritizes pedestrian safety over vehicle traffic efficiency.
80	Lauren Broudy, OMF CAO Spectator Venues Program	OMF	12/27/2022	Appendix B. RFFA, Standard Approach to RFFA	1 to 2		While all these options are possible—none are certain. The Moda Center, Dr. Jack's, the Rebound Clinic and Blazers Offices are privately owned and the owners of the buildings will determine if there will be work undertaken. The City-owned garages are not currently budgeted or planned to be replaced. Major reconfiguration work on the City-owned Veterans Memorial Coliseum and surrounding service areas that might be suggested as part of this project is also not currently budgeted or planned for. If the parking structures are eventually demolished or reconfigured, the parking they provide will need to be replaced within easy walking distance of the two arenas. It is not clear how such a project would be funded or where the parking would be located.
81	Lauren Broudy, OMF CAO Spectator Venues Program	OMF	12/27/2022	Summary of Avoidance, Minimization and Mitigation Measures		D9-D10	It will be absolutely critical that the regular schedule of events at the Veterans and Moda are able to happen as regularly scheduled. Any construction traffic detours or mitigations must continue to provide reasonable access by all transportation modes for patrons at events. If construction activities prevent events from being possible, there will need to be compensation for significant lost revenues to the City and to the Arena Operators.
82	Lauren Broudy, OMF CAO Spectator Venues Program	OMF	12/27/2022	Appendix E. Figure Descriptions		E-3	The previous design had neither ramp at N Ramsay Way which allowed for safer bicycle and pedestrian passageways. The current proposal creates undue danger for bicycle and pedestrian users at the intersection of Ramsay/Wheeler/Williams. It is not only less safe than the previous designs but it is potentially less safe than a no-build alternative. Vehicles trying to access the Garden Garage will now have to navigate through 4-5 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.
83	Lauren Broudy, OMF CAO Spectator Venues Program	OMF	12/27/2022	SEA, 3.8.1 Land Use Existing Conditions		49	The 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 6.33 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 onramps at Ramsay/Wheeler/Williams and the associated traffic, access, and safety impacts that result. Similarly, Portland's Central City 2035 Policy Goal 1.A upholds Portland's support for the Central City being the preeminent regional center for commerce and employment, arts and culture, entertainment, 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.
84	Lauren Broudy, OMF CAO Spectator Venues Program	OMF	12/27/2022	SEA, 3.13.1.1 Transportation, Transit		85	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 NE Wheeler Ave and N Williams Ave, particularly during event situations.
85	Lauren Broudy, OMF CAO Spectator Venues Program	OMF	12/27/2022	SEA, 3.13.2.2 AT, Short-term Construction Impacts		95	There are concerns about the safety for pedestrians and bicycles in the (N Ramsay 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.
86	Lauren Broudy, OMF CAO Spectator Venues Program	OMF	12/27/2022	SEA, Long-term Operational Impacts, Increased Non-Motorized Route Options		96	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 highway traffic at the N Ramsay 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.
87	Lauren Broudy, OMF CAO Spectator Venues Program	OMF	12/27/2022	SEA, 3.13.2.4, Traffic Operations, Avoidance, Minimization and Mitigation Measures		105-106	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.

K19071 I-5 Rose Quarter Improvement Project Administrative Public SEA

City of Portland Review Log

Comments Due: 12/27/2022

Agency Reviewer

Comment No.	Reviewer Name	Bureau	Date	Document	Page #	Line#	Comment
88	Lauren Broudy, OMF CAO Spectator Venues Program	OMF	12/27/2022	AT Supplemental TR, 6.2.1 Direct Impacts, Short term Construction Impacts	20-21		Event-level crowds considering simultaneous events in both arenas (25,000+) 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 CAO Spectator Venues Program	OMF	12/27/2022	AT Supplemental TR, 6.2.1 Direct Impacts, Long Term and Operational Impacts	23		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 CAO Spectator Venues Program	OMF	12/27/2022	Archaeological Resources Supplemental TR; Climate Change Supplemental TR (7); Historic	6		This is privately owned property by Vulcan that functions as part of the event district; it is needed to support large events (oversized vehicles, trucks, buses and staff parking). Those uses would need to be accommodated elsewhere if this project takes away regular, frequent full-capacity 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 CAO Spectator Venues Program	OMF	12/27/2022	Historic Resources Supplemental TR, 5.2 NRHP-Listed Properties	21		The Veterans Memorial Coliseum was placed on the National Register of Historic Places in September 2009. The protected, historic arena 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 events. Like the Moda Center, 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 CAO Spectator Venues Program	OMF	12/27/2022	Transportation Safety Supplemental TR, 6.4 Conclusion	33		Design options should be expanded to include options that do not overload the intersection (NE Wheeler Ave/N Williams Ave/N Ramsay Way) with the burden of both I-5 southbound on and off ramps. The economic tradeoffs 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 CAO Spectator Venues Program	OMF	12/27/2022	SEA, 3.11.1.3 Local and Regional Economy; SEA, 3.13.2.4 Traffic Operations, Revised Build	72		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 was estimated that approximately \$1.90 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 SSL	PBOT	12/27/2022	Safety Supplemental TR	28		Do we have any off-ramps along the interstate system in Oregon that match the design elements of the proposed SB off-ramp - namely multilane, 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 issues with this design include a lack of signal visibility, truck off-tracking 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 fatal flaw in the design.
95	Jamie Jeffrey, PBOT Traffic	PBOT	12/27/2022	SEA and Traffic Supplemental TR	SEA 3.8.2 p52 and 3.13.1.4 p87 & Traffic TR 6.1.1. p19		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 queuing and safety still apply. Sections 3.8.2 Environmental Consequences and 3.13.1.4 Traffic Operations in the SEA would be appropriate places to acknowledge. Statements that interchange intersections would need to meet ODOT mobility standards (v/c of less than 0.85) would not be consistent with the adopted MMA. 6.1.1 Direct Impacts in the Traffic Supplemental TR would be the appropriate place to acknowledge the MMA. Recommend using previously suggested language from ODOT - <i>As part of the adoption of the Central City 2035 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 as safety and multimodal access still apply.</i>
96	Jamie Jeffrey, PBOT Traffic	PBOT	12/27/2022	Traffic Supplemental TR	28		6.2.2.2 Future Local Street Traffic Operations also has language about mobility standards and should acknowledge the MMA. Recommend using previously suggested language from ODOT in the Synchro Analysis Results section of 6.2.2.2 - <i>No mitigation is proposed as the design is 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 falls within the MMA designation and therefore pedestrian safety and access would be prioritized over mobility standards.</i>
97	Jamie Jeffrey, PBOT Traffic	PBOT	12/27/2022	Traffic Supplemental TR	Sect 6.2.2.3 p40		Bicycle travel times for NB and SB, as well as EB to NB should be included. Although it wasn't as relevant in 2019, Hybrid 3 I-5 SB offramp configuration directly impacts the N and S movements for bicycles. It may inform different design options (i.e. Williams crossover at Hancock vs Russell, etc) to strive for best/balanced option to provide least impact to bike travel compared to options that delay bike travel more.
98	Jamie Jeffrey, PBOT Traffic	PBOT	12/27/2022	Safety Supplemental TR	General		Moda Center events should be discussed, as they are 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.
99	Morgan Steele	PBOT	12/27/2022	Tech Reports	Project Area Figure		The Revised Build Alternative Additional Area C appears to be within River overlay zones. Development within River 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	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	Cover		The date of the report on the cover is stated as August 2022. However, shouldn't it be updated to a November date? We last reviewed and commented on the 20220919 Draft-Second Review version of the report dated September 1, 2022. It is confusing to have the version dates go back in time.
101	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	Page 1		Exec Summary. 2nd paragraph on transit ridership: Consider adding a sentence about ridership recovery between these others. Such as: "... from 2017 to 2020. As of November 2022, transit ridership on the TriMet system was 54 percent of what it was pre-pandemic in February 2020. TriMet leadership..." https://trimet.org/about/performance.htm#ridership
102	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	Page 6		Section 2.2 Project Area and Fig 2. Project Area labeled E: The text needs its own bullet point. It got 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 I-5 Rose Quarter Improvement Project Administrative Public SEA

City of Portland Review Log

Comments Due: 12/27/2022

							Agency Reviewer
Comment No.	Reviewer Name	Bureau	Date	Document	Page #	Line#	Comment
103	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	page 10		Section 2.3 Highway Cover Changes: Include "transit stops and sidewalk corridors" among the other items in the sentence: " Upon Project completion, the added surface space created by the highway cover over I-5 could provide an opportunity for new and modern bicycle facilities, <u>improved transit stops and sidewalk corridors</u> , making the area more connected, walkable and bike friendly."
104	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	page 10-11		Section 2.5 RELATED LOCAL SYSTEM MULTIMODAL IMPROVEMENTS CHANGE text and Figure 4: Given current discussions about design options that may include the Clackamas Crossing, it seems prudent to revise this section. This comment likely applies to multiple tech reports.
105	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	page 13-14		Section 3.0 Regulatory Framework: Add the following project to the 2022 supplement. RTP project ID 11833 Inner North Portland Enhanced Transit Corridors. It is on the Constrained list. It is routed on N Vancouver and N Williams btwn Central City and Lombard. Also in the Portland TSP. Meant to improve bus speed and reliability for bus line 4 and 44.
106	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	page 13-14		Section 3.0 Regulatory Framework: Add reference to the following City of Portland/PBOT plans adopted by City Council: Enhanced Transit Corridors Plan and (June 2018) and Rose Lane Project (January 2020). visit: https://www.portland.gov/transportation/planning/enhanced-transit-corridors-plan and https://www.portland.gov/transportation/rose-lanes
107	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	page 13-14		Section 3.0 Regulatory Framework: Consider adding the 2019 Portland Streetcar Design Development Standards.
108	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	page 13-14		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 3-6 years. https://trimet.org/forward/
109	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	page 19		Section 5.2 TRANSIT 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 Basin St./N Fathom St. intersection, with three stops in between. https://www.multco.us/transit/swan-island-shuttle Questions? Please contact Eve Nilenders at eve.nilenders@multco.us , 503.349.5014.
110	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	page 19		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 2020. https://trimet.org/about/performance.htm
111	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Transit Supplemental Tech Report	Page 26		Section 6.2.4 Cumulative Effects: I noted the ODOT response to my September comments with concerns about this bullet statement. I concern still stands. I recommend some edit, even if vey general, such as: "The revised Build Alternative may limit Enhanced Transit Corridor Plans within the API; however, potential implementation of transit priority treatments by the ISRQ Project within the API could potentially result in transit speed and reliability improvements on transit operations and mitigate for increased transit travel time impacts summarized above. "
112	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Active Transportation Supplemental Tech Report	page 15-16		Section 3.0 Regulatory Framework: I did not see reference to the Lloyd District Special Street Design Standards. I believe they are applicable within the ISRQ Project Area. I recall they were developed and adopted in the 1990s. They include special sidewalk design standards. I am not able to locate them online. PBOT Development Review staff may be better equipped to share them.
113	April Bertelsen, PBOT Complete Streets	PBOT	12/27/2022	Supp EA 2.2.2.4	23	Last paragraph	Prelim Comment: We are not sure yet that this will be the preferred operation at this intersection. Will have to introduce the various options at this time until we've settled on a preferred design. ODOT Reponse: The project team looks forward to working with the City to review options. Second Draft and Final Comment: No change to document. Not sure if comment needs to be carried forward.
114	Jennie Tower	PBOT	12/27/2022	Supp EA 2.2.2.5	24	All	Prelim Comment: We are not sure yet that this will be the preferred operation at this intersection. Will have to introduce the various options at this time until we've settled on a preferred design. ODOT Response: This is the preferred option at this time. If, through conversations with the City, there are additional design refinements, they will be incorporated into future design. Second Draft and Final Comment: No change to document. Not sure if comment needs to be carried forward.
115	Jennie Tower	PBOT	12/27/2022	Supp EA 3.13.1.4	87-88		Prelim Comment: Include travel time data for local street routes. Response: Revised to explain "Local streets were evaluated based on overall intersection delays and intersection LOS." ODOT Response: Revised to explain "Local streets were evaluated based on overall intersection delays and intersection LOS." Second Draft and Final Comment: We're going to need travel time data to determine impacts to all modes, but maybe this doesn't need to be in the NEPA?
116	Jennie Tower	PBOT	12/27/2022	Supp EA 3.13.2.1	90	3rd Paragraph	Prelim Comment: PBOT has to review and agree that a 3rd through lane is the best approach. Describe a an option until we've settled upon a preferred design. ODOT Response: ODOT looks forward to working with the city to optimize the network during final design and acknowledges the need for city permits and concurrence on several design elements. The SEA describes the preferred design at this time. Second Draft and Final Comment: Language needs to be included acknowledging the impacts to <u>streetcar with 2 through or 3 through lanes since both options are still on the table. Identifying reduced impacts to streetcar due to a third lane that may not be implemented would be misrepresenting the potential impacts.</u>
117	Jennie Tower	PBOT	12/27/2022	Supp EA 3.13.2.2	91	Last paragraph	Prelim Comment: I think that many of the intersection crossings are actually getting longer. ODOT Response: Edit made, as intersections are getting shorter, longer or staying the same. Second Draft and Final Comment: Language still only identifies shorter crossings. Misrepresenting ped impacts.
118	Jennie Tower	PBOT	12/27/2022	Supp EA 3.13.2.2	96	Second bullet	Prelim Comment: Protection will likely need to continue to Hancock with new signal at Hancock providing transition from right-running to left-running. ODOT Response: City direction is needed to understand desired transition of NB bike facility on Williams. Will be refined with City input in the subsequent design phase. Second Draft and Final Comment: Probably need to include this and expand the API in the NEPA. Location of bike facility on Williams and transition still TBD, but make extend as far north as Russell and include a new signal at that intersection.
119	Jennie Tower	PBOT	12/27/2022	Supp EA 3.13.2.2			Prelim Comment: List out specific locations where crossings and sidewalk added and potential crossing removals. ODOT Response: The Traffic supplemental technical report provides a list bike and ped crossing assumption at key intersections in section 6.2.2. and includes assumptions on pedestrian crossings removals. Final Comment: Still don't see information related to filling sidewalk gaps.
120	Jennie Tower	PBOT	12/27/2022	Supp EA 3.13			Prelim Comment: Include description of long-term impacts due to columns and other improvements on Russell, Multnomah, Holladay, Lloyd and any others missed. Include potential mitigation measures to address these impacts. ODOT Response: There are no long-term impacts identified on these local streets. Any reconstruction of sidewalk or ADA facilities along these facilities will be detailed during the design phase in coordination with city of Portland. Second Draft and Final Comment: Isn't the NEPA intended to address these impacts? The columns will impact ped and bike facilities. Mitigation measures that are being considered to mitigate for these impacts should be identified.
121	Jennie Tower	PBOT	12/27/2022	Supp EA, App. D and Access TR			Prelim Comment: Include that an access management plan will need to be developed during project design. ODOT Response: We recognize the need for the plan and will work with the city during final design to develop the plan. Second Draft and Final Comment: Identify this need in the NEPA and funding to ensure that it happens. This plan will need to identify where accesses will be allowed and prohibited on new and redeveloped parcels include those on the lid.
122	Jennie Tower	PBOT	12/27/2022	Supp EA 3.13.2.2, Active TR 6.2.2			Prelim Comment: Should evaluate the segment, approach, and crossing for LTS per the Analysis Procedures Manual. This will be much more informative of overall conditions for cyclists in each scenario. LTS1 for all intersections for cyclists is very misleading. These are some of the highest level of stress intersections in the city. ODOT Response: Additional LTS analysis was conducted in response to this comment. Results will be provided in the Active Transportation supplemental tech report. Second Draft and Final Comment: Still missing assessment fo the approaches. It does not appear that the Supp EA was updated to reflect the additional analysis.
123	Jennie Tower	PBOT	12/27/2022	Supp EA 3.13.2.2, Active TR 6.2.2			Prelim Comment: Should evaluate both the segments and crossings for LTS per the Analysis Procedures Manual. This will be much more informative of overall conditions for pedestrians in each scenario. ODOT Response: Additional LTS analysis was conducted in response to this comment. Results will be provided in the Active Transportation supplemental tech report. Second Draft and Final Comment: It does not appear that the Supp EA was updated to reflect the additional analysis.
124	Jennie Tower	PBOT	12/27/2022	Global			Prelim Comment: Should also provide a crosswalk on the south leg at Ramsay/Williams. Closure 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 east 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 COP in 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

K19071 I-5 Rose Quarter Improvement Project Administrative Public SEA

City of Portland Review Log

Comments Due: 12/27/2022

Agency Reviewer

Comment No.	Reviewer Name	Bureau	Date	Document	Page #	Line#	Comment
125	Jennie Tower	PBOT	12/27/2022	Active Transportation Supp TR	22	4th Paragraph	Prelim 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 bike 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 Supp EA that this will be evaluated and potentially included during design.
126	Jennie Tower	PBOT	12/27/2022	General			This assessment describes impacts of a project with design elements that won't be implemented or will be changed. And we have deviated further from this design since the preliminary draft SEA review.
127	Jennie Tower	PBOT	12/27/2022	Access Memo	Figure 2		I think the intersection of Russell/Kerby is also being modified with EWPA. Hancock/Williams, Hancock/Vancouver, Hancock/Flint, Broadway/Vancouver, and Broadway/Flint/Wheeler were all being modified in the previous design, but are identified as new intersections to be modified in this figure. Dixon/Wheeler should be identified as an intersection no longer to be modified.
128	Jennie Tower	PBOT	12/27/2022	Supplemental Environmental Assessment Report	page 86		Section 3.13.1.1 Transit: Minor correction to this sentence: FTA Capital Investment Grants program Small Starts and New Starts funds were used to construct existing streetcar and MAX light rail facilities; therefore, there is an obligation to continue to provide service
129	April Bertelsen, PBOT Complete Streets	PBOT	12/28/2022	Supplemental Environmental Assessment Report	page 89		Section 3.13.2.1 Transit, Short-term Construction Impacts: Add potential temporary short-term impacts during construction to 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 Basin St./N Fathom St. intersection, with three stops in between. https://www.multco.us/transit/swan-island-shuttle Questions? Please contact Eve Nilenders at eve.nilenders@multco.us, 503.349.5014.
130	April Bertelsen, PBOT Complete Streets	PBOT	12/28/2022	Supplemental Environmental Assessment Report	page 90		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	page 90 page D-7	Section 3.13.2.1 Section - Transportation	Section 3.13.2.1 Transit, Avoidance, Minimization, and Mitigation Measures: Add sentence or paragraph about additional measures to help mitigate for temporarily suppressed transit ridership. This could include, "ODOT would coordinate with City of Portland, TriMet and PSI in the final design and construction phases to minimize and mitigate for temporarily suppressed transit ridership and help restore and grow transit ridership in the API. This would include the Project funding educational, encouragement and incentive campaigns to promote transit ridership during construction and following project completion to help with activation of the new walking, biking and transit infrastructure and restored regular transit routes and service. These campaigns may also be coordinated with other transportation management and operation strategies (TMOS) for the Project."
132	April Bertelsen, PBOT Complete Streets	PBOT	12/28/2022	Supplemental Environmental Assessment Report	page 120		Section 3.16.12, Transit: Add revision to this sentence: "... opportunities could arise to implement Enhanced Transit Corridors Plan recommendations or other transit speed and reliability improvements on API corridors in tandem with the Revised Build Alternative.
133	T Doss, BPS Lead	BPS	1/3/2023	General			There is a need to ensure the highway cover is designed and constructed to maximize development potential and to be able to achieve 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 programable 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 on land immediately adjacent to the cover.
134	T Doss, BPS Lead	BPS	1/3/2023	General			The removal of the Clackamas Overcrossing for the Green Loop connection between the Lloyd District and Rose Quarter creates a significant barrier to establishing a safe and attractive pedestrian and low speed bike connection over I-5. No existing alternative routes provide such a direct connection, nor one that avoids major transit lines, freeway related traffic, or significant grade changes. Further, the relocation of the Green Loop to the Broadway/Wiedler couplet was done without coordination with the City of Portland, who will own and maintain that infrastructure. Lastly, the Green Loop is designed to act as a grade separated facility that avoids high traffic volumes and high speeds, such to be attractive to safety concerned users. The relocation of the Greenloop passing two off-ramps and on-ramp is in direct conflict with the basis for the Green Loop concept.
135	Sharon Daleo	PBOT	1/3/2023	General			The RMPP Sensitivity Analysis provided in Appendix D of the Traffic Analysis Supplemental Tech Report reflects that RMPP has the potential to lower the travel demand on I5RQ 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 RMPP in the opening day configuration.

Portland Pedestrian Advisory Committee

December 27, 2022

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_{2B}
Co-Chair, Portland Pedestrian Advisory Committee

Portland Bicycle Advisory Committee

Working to Make Bicycling a Part of Daily Life in Portland

1001 SW 5th Avenue, Room 1300
Portland OR 97204



December 27, 2022

To: Chris Warner, Director Portland Bureau of Transportation

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

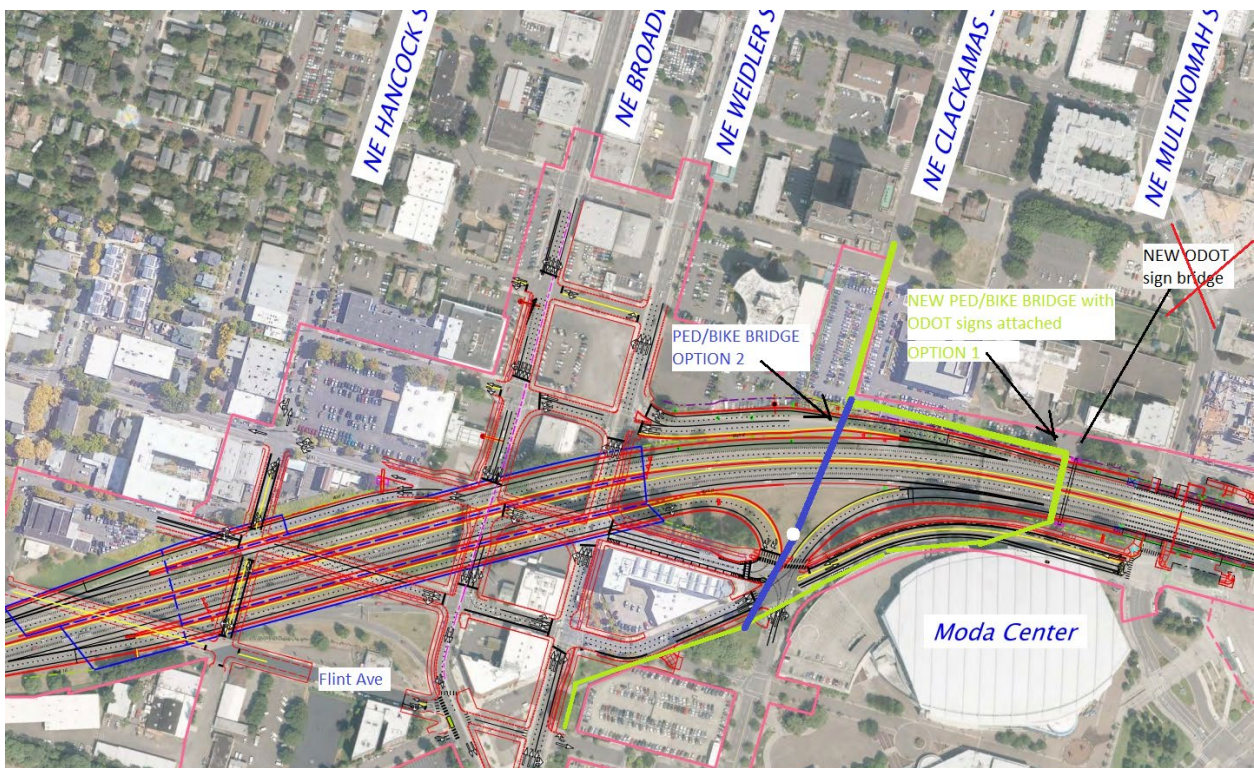
“All of us in the country and literally in the world count on Portland to lead, and it is time, I think, for you to challenge some basic assumptions.” Former Mayor of Minneapolis, R.T. Rybak

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.

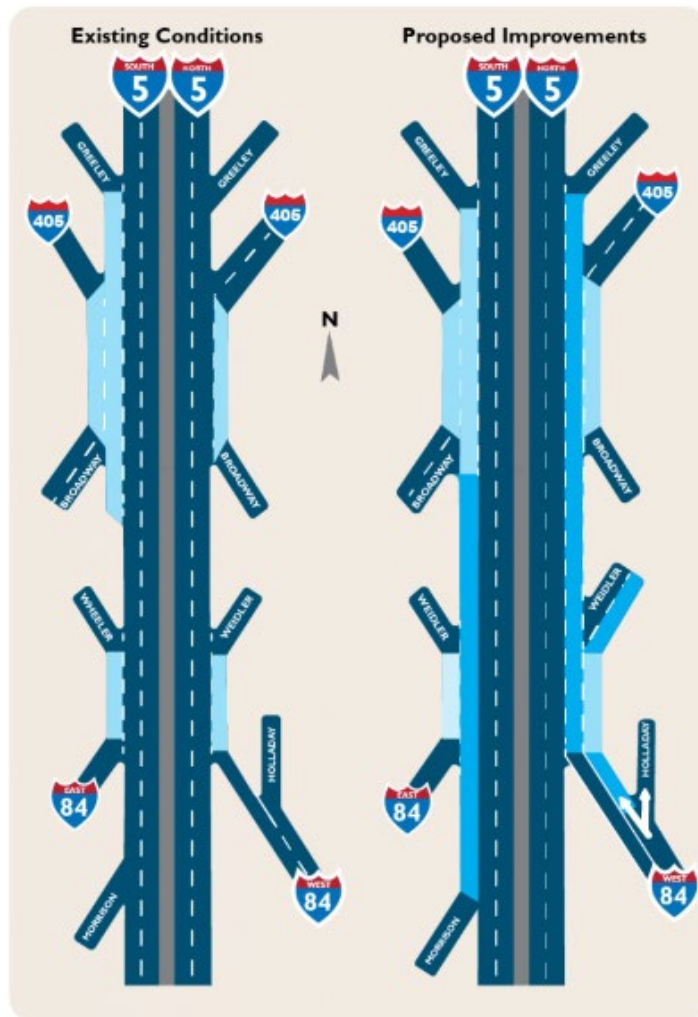
It is puzzling that some aspects of the no build alternative are better for people riding bicycles than the revised build alternative submitted in the SEA. How will the City and FHWA endeavor to make bicycling more attractive than driving in this project?

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 million¹ 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.

¹ HB 5202-1 Amendment: Index of Sections (2022 Budget Reconciliation).
<https://olis.oregonlegislature.gov/liz/2022R1/Downloads/CommitteeMeetingDocument/254502>

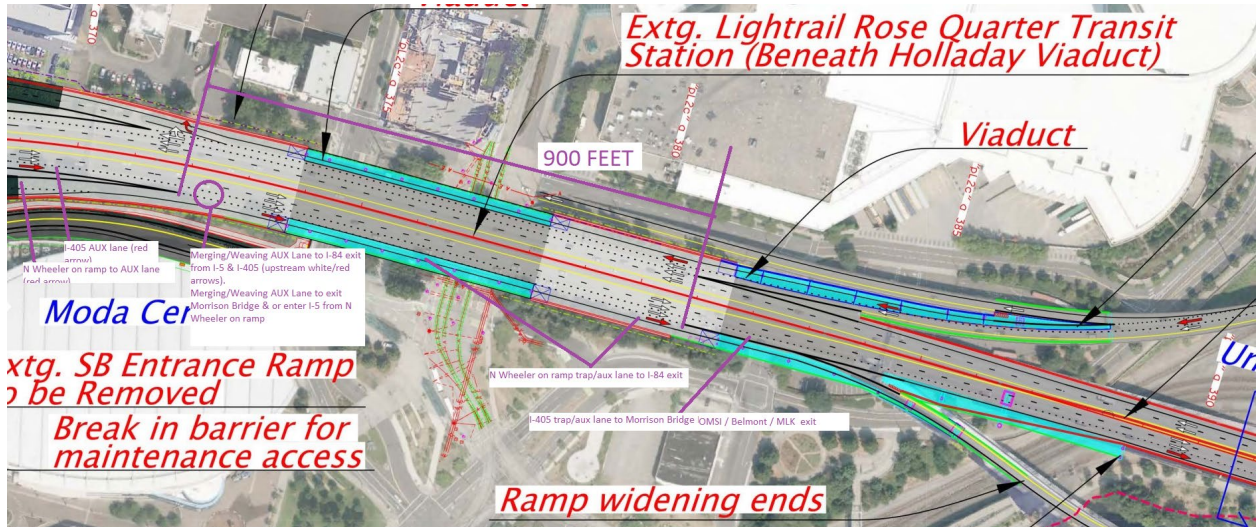


Existing Ramp-to-Ramp (Auxiliary) Lanes
Proposed Ramp-to-Ramp (Auxiliary) Lanes

OREGON DEPARTMENT OF TRANSPORTATION'S DIAGRAM SHOWING THE NEED FOR ADDITIONAL "AUXILIARY" LANES ON I-5. (ODOT)

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

² Safety Impacts of Auxiliary Lanes at Isolated Freeway On-Ramp Junctions: Journal of Transportation Safety & Security: Vol 5, No 4. <https://www.tandfonline.com/doi/abs/10.1080/19439962.2012.761661>

³ Methods of dropping auxiliary lanes at freeway weaving segments: Transportation Planning and Technology: Vol 41, No 4. <https://www.tandfonline.com/doi/abs/10.1080/03081060.2018.1453462>

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

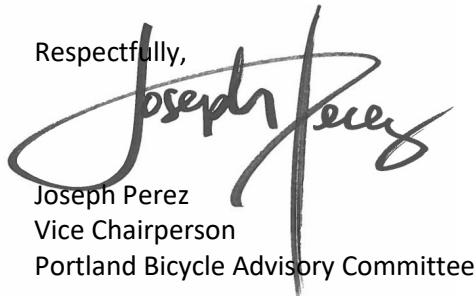
⁵ Combined Crash Frequency–Crash Severity Evaluation of Geometric Design Decisions: Entrance–Exit Ramp Spacing and Auxiliary Lane Presence. <https://journals.sagepub.com/doi/10.3141/2521-06>

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 deprioritizing 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 stress 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,

A handwritten signature in blue ink that reads "Jana Jarvis". The signature is written in a cursive style with a large loop at the end of the last name.

Jana Jarvis

Chair

Portland Freight Committee

Cc: Sharon Daleo, PBOT



City of Portland
Historic Landmarks
Commission

City of Portland
Design Commission



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

A collection of handwritten signatures in various colors (black, blue, brown) arranged in three rows. The signatures are:

Row 1: Kristen Orin, Peggy Mowatt, [unclear], Kim M...

Row 2: Matthew Roman, Mya Fry, [unclear], [unclear]

Row 3: [unclear], Kimberly S. M... [unclear], [unclear]

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