

Portland Bicycle Advisory Committee

Working to make bicycling a part of daily life in Portland



March 19, 2019

Commissioner Chloe Eudaly & Portland City Council
1221 SW 4th Ave
Portland, OR 97204

Megan Channell, Project Manager, Oregon Department of Transportation
123 NW Flanders St
Portland, OR 97209

Re: ODOT I-5 Rose Quarter Environmental Assessment - No-Build Alternative

As a citizen committee representing a broad spectrum of Portlanders advising the City on matters related to bicycling, the Portland Bicycle Advisory Committee (BAC) is writing to strongly recommend the No-Build Alternative for I-5 Rose Quarter Improvement Project. While the project in its current configuration should not be built, the Albina neighborhood is not without need. Albina Vision, a community created and led plan to heal the neighborhood devastated by the construction of the I-5 freeway decades ago, should be the starting point for a new transportation improvement project that fully reconnects the neighborhood over I-5. We find that the Build Alternative would fail to achieve the stated project goals and objectives, especially in critical areas related to bicycling, but also including resulting conditions for walking and transit, local connectivity, safety, equity, and climate outcomes, in direct conflict with city and state planning goals.

Throughout the project area, the Build Alternative would mostly propose rebuilding bicycle facilities on the same streets that already have them, except in some places like the Flint St overcrossing, currently used by 3,000 bicyclists per day, which would be permanently removed. For the 8,000+ people who currently bicycle through the project area every day, according to the Active Transportation Technical Report, “multimodal conflicts could increase [and} bicycle detour options would be limited.” We are strongly concerned whether it is possible to support existing bicycle travel patterns during construction, as Active Transportation Technical Report Section 6.2.1 identifies:

“The CPC [Construction Phasing Concept] Plan does not address the following:

- *Design details for temporary pedestrian/bicycle facilities (e.g., facility typologies, widths, and signage)*
- *Details for maintaining pedestrian and bicycle movement throughout the entirety of the Project’s construction timeline”*

For people walking and biking the city’s Waterfront loop, the Eastbank Esplanade would be closed for an unknown duration for work on piers in Willamette River supporting portions of the freeway proposed to be expanded. Requiring bicyclists to leave existing protected paths or bike lanes to ride in mixed traffic detours during construction of the project for five years would increase travel times and travel distances, and reduce safety to a level that has not been specified or quantified.

After five years of construction, the Build Alternative would not offer compelling improvements for bicycling. The predominant bicycle travel pattern through the project area is between downtown Portland and all of North and Northeast Portland north of I-84, via the Broadway and Steel Bridges. The proposed new Clackamas bicycle and pedestrian bridge touted by the project, does not support this travel pattern and would not replace any of the decreased utility of changes to the rest of the bicycle facilities in the project area. Under the Build Alternative, the majority of bicycle trips through the project area would experience increased delays due to signalization, reduced connectivity and steeper grades compared to existing routes under the No-Build Alternative. Many existing street design issues facing bicyclists and pedestrians such as exposure to double turn lanes and wide curb radii at freeway ramp intersections would not be addressed in the Build Alternative. These proposed designs rate bicycle and pedestrian movements as a lower priority than vehicle movements, requiring two-stage crossings and increasing delay. Some facilities planned in the Build Alternative touted as improvements over existing conditions, such as the proposed two-way multi-use separated facility on the rebuilt Williams Ave crossing, actually build in design problems that have not been solved, such as transitions back to one-way facilities on either side of the project area, which would likely only be achieved by additional signalization and accompanying increased delay. These design features do not belong to Major City Bikeways like Broadway/Weidler and Vancouver/Williams, which according to the Portland Transportation Plan should be designed “maximize [...] comfort and to minimize delays by emphasizing the movement of bicycles.”

While the BAC is primarily responsible for advising the Portland Bureau of Transportation and Portland City Council on matters related to bicycling, transportation issues are multimodal, and transportation funding is finite. Walking, bicycling and transit all support each other as complementary modes that increase equity, livability, safety and efficiency. Transportation projects deserve funding based on cost effectiveness at achieving overarching transportation and land use planning goals, which increasingly focus on mitigating climate change. The BAC also supports the No-Build Alternative for these related reasons:

- Similar to outcomes for bicycling, bus travel times through the project area under the Build Alternative would increase for many routes according to the Transit Technical Report, decreasing the viability of transit in the project area.
- While funding for the I-5 Rose Quarter project was assigned by HB 2017, the project budget is unclear. There is no reference to the overall project budget in the 38-page Environmental Assessment Executive

Summary. Any cost to Portland when the project cost exceeds this amount would reduce the City's ability to build more impactful bicycling, walking and transit improvements.

- Technical Report sections 6.3.2.2, Reasonably Foreseeable Future Actions, a required portion of the alternatives analysis for the Build and No-Build Alternatives of the Environmental Assessment, do not include the implementation of value (congestion) pricing on the freeway system in the Portland area. A study of value pricing was included in the same bill, HB 2017, that funded this I-5 Rose Quarter project. Any analysis of this project is incomplete without considering the effects of value pricing on the project area.
- The Climate Change Technical Report, which appears to be a limited analysis on only freeway traffic rather considering than the outcomes for climate-friendly walking, bicycling and transit trips that cross it, and based on an unsupported assumption that 2045 traffic volumes will be the same as 2017, projects only a 0.2% reduction in carbon emissions over No Build. This is incompatible with the recent UN IPCC report that identified the urgent need to reduce carbon emissions by 50 percent by 2030, and reaching net zero carbon emissions by 2050.
- While the I-5 Rose Quarter project has been billed as safety project, no fatal crashes have occurred in the project area since 2009. The victim of the fatal crash in 2009 was a pedestrian attempting to cross the freeway in an area where no crossings were available. According to PBOT data from 2010-2018, 133 people walking and bicycling have died on other Portland streets since then.

As a regional multimodal hub, the transportation network in Albina is overdue for investment that reflects the city's and state's current transportation planning goals and priorities. This investment should prioritize equity, active transportation, transit, and safety. Instead, the proposal on the table is for a freeway expansion, and attempting to patch local connections, bicycling, walking and transit facilities back together afterward.

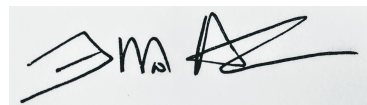
For these reasons, we strongly endorse the No-Build alternative for I-5 Rose Quarter Improvement Project.

Thank you for your consideration,

Respectfully submitted on behalf of Portland's Bicycle Advisory Committee,



Rithy Khut, Chair
Bicycle Advisory Committee



Elliot Akwai-Scott, Vice-Chair
Bicycle Advisory Committee

Cc: Portland Pedestrian Advisory Committee
Portland Planning & Sustainability Commission
Oregon Transportation Commission