

I-5 ACCESS ALTERNATIVE STUDY
ACCESS ADVISORY TASK FORCE
MINORITY REPORT AND RECOMMENDATIONS

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SUBMITTED BY

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Introduction

The necessity for a minority report, despite the Access Advisory Task Force's (AATF) thorough review of available background material and concerted effort to identify I-5 access alternatives which the entire task force could support, is indicative of the technical/logistic difficulty of the task, the conflicting nature of relevant transportation objectives and divergent viewpoints within the Task Force itself. It has become apparent that, like the AATF, Council may not be able to reconcile these difficulties and differences but rather will have to choose one option over another based upon its relative merits within the context of those criterion deemed most appropriate for the benefit of the City of Portland. With this in mind, the Minority (comprising four of nine Task Force members) could not accept the recommendation of a single "alternative" (the Water Avenue Ramp) as put forth in the "Executive Summary and Recommendations," since other viable options do exist and merit further consideration by Council.

While provision of enhanced market access for the Central Eastside Industrial District (CEID), particularly relating to southbound I-5 access, is important, it is important that this objective be studied within a broader context. The question of how best to serve the transportation needs of the CEID as a whole must be weighed against the needs of the city as a whole. In terms of the narrowly defined objectives of the Task Force, the Water Avenue ramp does best satisfy the need for southbound access to I-5. It is, however, the Minority's position that the Task Force's objectives were so narrowly defined as to preclude selection of other viable alternatives. Furthermore, these constraints resulted in oversimplification of a complex issue and effectively excluded discussion of highly relevant issues such as broader transportation objectives, budget priorities, planning objectives and impact on alternative transportation systems.

It is important to remind Council that oversimplified or narrow objectives which serve to expedite "popular" projects are not necessarily based in sound policy or, more importantly, the basis for great cities. This seems especially true of transportation projects and there is no better example than the Eastbank Freeway itself, which both literally and figuratively followed, "the path of least resistance." Issues unresolved at the time it was built remain unresolved sources of frustration to this day and, in fact, impinge upon the issue at hand. Failure to engage these unresolved issues and broader policy questions only perpetuates this frustration. Consequently, the Minority would strongly recommend that Council review the Majority Recommendation (i.e. that the Water Avenue ramp is "the only alternative") within a broader context and reassess the merits of excluded alternatives, particularly the Ross Island Bridge Route - Major Improvements & Minor Improvements (Alternatives 3.3 & 3.2), within the same broader context.

The unresolved issue at hand is how best to serve the transportation needs of the CEID; the question is what contextual framework is most appropriate and necessary for a well-informed decision. While opinions differ on how it will evolve in the future, there is a clear consensus that the CEID is a unique and important part of the city, the ongoing health and development of which is key to Portland's future. Transportation to and from the district, therefore, is unquestionably important. At question, however, is the relative importance of the Water Avenue ramp in serving the overall transportation needs of the CEID and the city as a whole. The Minority recommends, therefore, that Council should not attempt to resolve transportation problems in the CEID without due consideration of the following broader issues.

Transportation Objectives

While the I-5 ramp (southbound from Water Avenue) has long been identified in transportation documents as a necessary addition to the existing system of particular importance to the CEID, there is relatively little objective empirical evidence in the background material and technical analysis provided for this study to support this premise. Although considerable testimony has been given in support of the Water Avenue ramp, particularly from the Central Eastside Industrial Council (CEIC), it has primarily been "professional opinion." "Data" provided by the CEIC constitutes little more than polls of select businesses most likely to benefit from the Water Avenue ramp (i.e. trucking companies and bulk distributors): an example of such "data" is the "Oregon Drayman Study Summary." Such surveys have generated exaggerated "estimates" of commercial vehicle use not supported by actual counts provided by project staff. Computer modeled projections based on the Regional Transportation Plan (RTP) are designed primarily to identify commuter traffic patterns at rush hours and do not specifically address the heavy truck traffic patterns, identified by the CEIC as critical.

The only empirical studies available to the Task Force were manual traffic counts taken by project staff at the request of Task Force members. These hourly counts tend to exaggerate CEIC claims. While the Oregon Drayman Study Summary projects 404 vehicles per day (vpd) based on companies actually surveyed, it extrapolates by a factor of three to project 1212 vpd, ostensibly to account for those not surveyed. Actual hourly counts resulted in 40, 32, and 17 "heavy commercial vehicles" in three representative counts. From these counts staff projected 400 "heavy commercial vehicles" per day not 1212, and that number was based on the amazing definition of a "heavy commercial vehicle" as anything, "larger than a pickup truck with a minimum of one set of rear dual wheels." "Light commercial vehicles" would presumably be ordinary pickup trucks, vans and cars. The Oregon Drayman Study Summary does not even include this category of vehicles which constituted approximately 64 percent of the "trucks" in the hourly counts. Furthermore, relative to this study and the often reiterated contentions of the CEIC, the most critical element of truck traffic (that which for "safety" reasons necessitates the ramp), over-the-road tractor trailer rigs were not differentiated in either the Oregon Drayman Study Summary or the hourly counts. Based on numerical ratios in the available data and average incidence of local delivery vehicles (i.e. UPS type step vans, etc.) versus tractor trailer rigs, the latter most likely accounts for less than half of the 400

vpd projected by project staff. Thus the estimated 1200+ "heavy trucks" is more likely 200 or less, as most people understand it, or one sixth what has been commonly represented.

The accuracy of these statistics is of crucial importance since the ongoing contention of the CEIC has been that safety concerns for drivers of large trucks precludes the use of alternative routes such as the Ross Island Bridge. If tractor-trailer rigs comprise a relatively small volume of total truck traffic in the district, such an argument diminishes considerably in stature. Evidence suggests that the vast majority of commercial vehicles in the CEID are not tractor trailer rigs, but rather light commercial vehicles, delivery vans etc., which may at times use surface routes expressly to avoid congestion on I-5 and other major freeways in the central city. If, as Jack Burns has testified to the Task Force, it is reasonable and prudent (again in the interest of safety) for tractor-trailer rigs to use I-5 North, the Fremont Bridge and I-405 South to gain access to Highway 26 West (even if the Water Avenue on-ramp were built), why would it be unreasonable to expect a southbound vehicle to continue approximately one extra mile on I-405 to the I-5 South interchange? Why, if the narrow (but straight) lanes on the Ross Island Bridge are such a safety concern was the Water Avenue Ramp pursued just as zealously by the CEIC prior to the recent improvements at the east end of the Marquam Bridge which, at that time, had lanes just as narrow in addition to significant gradient and curves as well? Such arguments ring somewhat hollow.

Prior to any decision regarding the Water Avenue ramp or any alternative route providing access to I-5, this objective should be reassessed relative to other transportation objectives within the city based on a rational hierarchy of need and comprehensive empirical information. There is currently a remarkable paucity of statistical evidence supporting the premise that southbound I-5 access, such as the Water Avenue ramp would provide, is an urgent priority, as it has been represented by the CEIC. Those uses which would make it necessary (i.e. "heavy trucks") represent, in all likelihood, a need of smaller magnitude than has been assumed. While those users have been well organized, public testimony suggests that many other businesses in the CEID do not perceive such access as a pressing need and in fact a great number of businesses in the CEID (light manufacturing, service companies, storefront businesses, etc.) have little or no need for improved access for heavy trucks. Comparative analysis involving other major industrial districts would be highly informative. It seems quite possible that, were the Water Avenue ramp built to satisfy the CEIC, a precedent would be set for providing improved freeway access in numerous other industrial areas such as the Northwest Triangle, Swan Island, St. Johns, Milwaukee, and along the I-84 corridor to name a few. The Minority would recommend strongly that several representative 24 hour traffic counts be taken, differentiating clearly between the various types of cars and trucks currently using the Water Avenue off-ramp as the basis for a comparative need assessment. Finally, the Minority would remind Council that funding a project such as the Water Avenue on-ramp may have transportation policy implications which reach far beyond the CEID.

Budget Objectives

While the Water Avenue on-ramp has long been on the priority list in terms of transportation projects, it has, for one reason or another, never been fully funded and built. This history dates back to the original construction of the Eastbank Freeway, and is the source (justifiably) of much frustration of the part of the CEIC. It is perhaps this history as an "unfunded" priority which has caused it to grow in stature over the years as a project of importance and merit. It has, to some extent, been assumed that the Water Avenue on-ramp must be important because it has remained a "priority" project for so long. It is important to remember that the Mt. Hood Freeway enjoyed a similar status not so very long ago. In an era of extreme fiscal austerity, the necessity of a \$20,000,000 project cannot be assumed. As has been suggested in the previous section, a comparative cost benefit analysis with other comparable projects is imperative. Based on background material provided to the AATF, other projects even within the CEID seem to be more justifiable candidates for funding. Of particular note is the tenuous state of the Martin Luther King/Grand Avenue viaducts which are literally sinking into the ground and in danger of being condemned as a safety hazard. There is little doubt that failure to rebuild these viaducts would have a dramatically greater impact on the CEID than would failure to build the Water Avenue on-ramp. The Minority would strongly recommend that Council reassess the Water Avenue ramp from a fiscal standpoint in consideration of the City's limited budget and other far more pressing needs. Retrospectively, it may well be for good reason that this project was never funded or built.

Planning Objectives

While the Water Avenue on-ramp has long been a part of transportation planning, it has also long been in conflict with City planning objectives for the east bank. While it would unquestionably enhance CEID access to I-5 southbound, in so doing it would also reinforce commitment to an aging section of freeway already at or beyond capacity much of the time. Construction of the Water Avenue on-ramp only exacerbates the current domination of the east bank by I-5 and all its multifarious ramps. The land area along the Willamette currently occupied by the freeway is considerable and has been identified as too valuable for such a use. According to the "Willamette River East Bank Review," I-5 should be, "removed from the east bank of the Willamette River," and the land, "should be used for development of the river's edge." While the recommendations of the advisory committee were in no way binding, subsequent action by City Council including withdrawal of support for the Water Avenue ramps and commissioning of this Task Force to investigate alternatives to the Water Avenue ramp, reflect commitment to the intent of those recommendations.

Commitment to removal/relocation of the Eastbank Freeway goes beyond endorsement of an attractive planning concept. It represents an important part of the city's overall response to established and, in some instances, legally binding planning and land use mandates at the city, regional, state, and federal levels. Respective of growth projections, the Central City Plan, the 2040 Plan, Metro Growth Plan, the Urban Growth Boundary, state and federal transportation and land use policy, development of large tracts of land within the central city such as the east bank are imperative.

Development of underutilized land in the Northwest Triangle area on the west bank is already underway as is development of lands south of River Place. The east bank is the next available large parcel in the central city and its development potential for light industrial, commercial, mixed-use and especially high density housing must be respected. Construction of the Water Avenue on-ramp runs counter to these objectives. In addition, transportation and air quality standards also dictate a shift away from freeway based transportation systems and towards other modes such as mass-transit, bicycling and walking facilitated by home/workplace proximity. These models are already integral to city planning policy. While the Water Avenue on-ramp remains a part of the Regional Transportation Plan, it and the Eastbank Freeway in its current guise are in conflict with broader transportation policy in addition to conflicts with planning policy.

Beyond the established reasons not to proceed with the Water Avenue on-ramp is the inherent weakness in the reasoning for building it. No compelling or definitive evidence has been brought forth either in oral or written testimony that lack of the ramp has adversely affected the economic health or development of the CEID. Most evidence is to the contrary: major indicators are trending upwards in the CEID, new business starts, employment, new construction and gross product/income. In fact, new construction is at an all-time high. Furthermore, the profile of newer businesses in the CEID is trending towards those which provide more jobs per area occupied with generally lower environmental impact. These factors along with smaller size and greater diversity of businesses tend to make the area more compatible with mixed use and the interjection of a substantial housing component. These are all positive signs in sympathy with planning and transportation objectives, potentially putting new residents in close proximity to new jobs. Incremental benefits of this pattern could benefit CEID traffic problems since job proximity tends to reduce commuter demands on the road system leaving it better able to accommodate necessary commercial traffic. In light of these factors there is little to suggest that spending \$20,000,000 on the Water Avenue on-ramp is imperative to insure the future economic health of the CEID. Making such an expenditure on the speculation that it might improve business in the district to some intangible degree, given all of the reason not to do so, seems imprudent. The Minority would recommend careful review of the Water Avenue on-ramp's impact on planning objectives for the east bank, especially with respect to planned relocation/removal of the freeway. In addition, we recommend reassessment of the need for direct freeway access relative to its impact on the economy of the CEID, respective of the current health of the CEID, in absence of such direct access.

Alternative Transportation Objectives

Because of the narrow focus of the Task Force, relatively little time was given to the issue of conflicts with alternative modes of transportation, although this issue was the subject of a significant portion of public testimony. Similar to many of the planning issues, consideration of alternative modes of transportation is not discretionary. Again, from the city level to the federal level, policies are in place which clearly require facilitating increase usage of these modes. The Water Avenue on-ramp is in conflict with virtually every alternative mode of transportation. The Eastbank Freeway in

general, and the addition of a new Water Avenue ramp in particular, virtually preclude the introduction of any tenable pedestrian environment on the east bank. Vast expanses of ugly hostile landscape, extreme noise and air pollution, interruption of through paths both parallel and perpendicular to the river, and low levels of personal safety render the area around the freeway, its ramps and the east bank a "pedestrian-free" zone. Most of the preceding also applies to bikers. In addition, the presence of the freeway prevents development of the kind of high density urban fabric which is inviting to pedestrians and bikers.

The Eastbank Freeway is a clear impediment to light rail in the south/north corridor to such an extent that the line which should logically extend between OMSI and the new transit center along the east bank will be routed across the river and through downtown necessitating major improvements to an existing bridge or construction of a new one at great expense.

Even if the east bank were never developed and the south/north light rail line never built, the conflict with freight and passenger rail travel on the Southern Pacific Railroad main line renders the Water Avenue ramp unacceptable. Even at current low levels of use, the projected wait time is unprecedented for an interstate on-ramp (as is the concept of an on-ramp with a grade level rail crossing). The estimated six minute wait which would occur 14 or more times per day (in addition to delays for passenger trains) in conjunction with an average vehicle arrival rate of 338 per hour translates to 34 cars queues on average, longer at rush hour. Such a queue would extend several blocks tying up cross traffic at 1st, 2nd and 3rd, and perhaps spilling on to Grand Avenue. No mention was made of the conflict between a metered on-ramp and a signaled rail crossing, but this condition would also exist. This would be implemented in conflict with the Oregon PUC's mandate to eliminate grade level rail crossings whenever possible. Finally, there is the issue of high speed passenger rail through this same corridor in conjunction with expectations that rail freight volumes could double within the decade. Both conditions are quite likely and utterly incompatible with the Water Avenue on-ramp. The Minority recommends that Council review all modal conflict issues prior to acting on any access alternative and particularly the Water Avenue on-ramp as recommended by the AATF majority.

Conclusion

Despite the position taken by the Majority in the "I-5 Southbound Access Alternative Study Executive Summary and Recommendation," the Minority believes strongly that the singular recommendation of the Water Avenue ramp (Alternate 4.1) is ill advised for those reasons enumerated in the body of this report. While this alternative does best provide access as defined in the "Study Purpose" statement, (the primary goal being, "to accommodate the commercial traffic services supporting the Central Eastside industrial land use base") and based on assumptions about levels and patterns of use, the Minority contends that the definition is excessively narrow and assumptions about use somewhat inaccurate. Evidence, however incomplete, suggests that use patterns, specifically regarding the incidence of "heavy trucks" were inaccurately represented in background information provided to the AATF. The implication that the Water Avenue ramp was

the only acceptable alternative because of concerns for the safety of large tractor-trailer rigs in substantial numbers has not yet been corroborated by statistical evidence. Given a more accurate sense of the nature of CEID truck traffic, i.e. mostly smaller trucks and vans, the prejudice against surface route alternatives such as Ross Island Bridge proves largely unwarranted.

Concerns raised about the Ross Island Bridge being at capacity are equally true of I-5 (or any other major central city arterial for that matter). Given the shortfall of statistical evidence to support the necessity of the Water Avenue ramps, it is likely that this is more a perceived need than an actual one.

In addition to the limited or questionable justification for the ramp (conflicts with transportation objectives) there were also clear conflicts with other budget objectives, most notably the cost of rebuilding the MLK/Grand Avenue viaducts which demand immediate attention. Furthermore, while the Water Avenue ramp would be an expensive short term investment tied to an aging section of freeway slated to be removed in 15-25 years, investment in the MLK/Grand Avenue, McLoughlin Boulevard corridor (whether minor or major) would be a long term investment in a permanent roadway. Such improvements would be consistent with long range budget priorities but avoid other conflicts associated with the Water Avenue ramp.

Finally, the Water Avenue ramp posed overwhelming problems in terms of conflicts with long and short term city and transportation planning objectives. Expenditures on this small segment of I-5 typify trends in transportation planning which have proven largely untenable in recent decades—extremely high costs associated with modest and temporary gains in traffic management at the expense of planning objectives and urban livability. When the thrust of planning efforts is clearly the reduction of dependence upon the freeway for transportation needs, the curtailment of freeway oriented growth patterns, increased emphasis upon alternative transportation and dense mixed use urban development, spending \$20,000,000 on an aging freeway for a short term transportation “fix” seems ill-advised and counterproductive.

It is the strong recommendation of the Minority, that Council definitively terminate the Water Avenue ramp project, rejecting the AATF’s formal recommendation of that option. Furthermore, we recommend that Council pursue the further the technical development of the Ross Island Bridge options for improved connections to I-5 southbound as well as southeast arterials. Finally, we recommend that no further study of direct access to I-5 in the CEID be pursued except in conjunction with plans for removal/relocation of the Eastbank Freeway.

Respectfully submitted,

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