

# Portland Bicycle Advisory Committee

Working to make bicycling a part of daily life in Portland



March 22, 2019

Commissioner Chloe Eudaly & Portland City Council  
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## **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 vision of a vibrant, prosperous neighborhood between the Willamette River and Lloyd District.

Throughout the I-5 Rose Quarter project, obfuscation and delay in providing information for public review has hampered the ability of the community and stakeholders, including the BAC, to provide meaningful input. This includes key information not released at the beginning of the Environmental Assessment 45-day public comment period. Transportation modeling assumptions were not released until 20 days after the beginning of the comment period. Partial engineering drawings were released yesterday with only 10 days remaining in the comment period, while fully detailed drawings have still not been released as of the writing of this letter. The BAC joins the call for a full Environmental Impact Statement before the project proceeds any further.

Based on the limited information provided, the BAC finds that the Build Alternative would fail to achieve the stated project goals and objectives, especially in critical areas related to bicycling, but also including the resulting conditions for walking and transit, local connectivity, safety, equity, and climate outcomes. This is in direct conflict with city and state planning goals.

Throughout the I-5 Rose Quarter 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 Ave overcrossing, currently used by 3,000 bicyclists per day, which would be permanently removed. During five years of construction, “multimodal conflicts could increase [and] bicycle detour options would be limited” for the 8,000+ people who currently bicycle through the project area every day, according to the Active Transportation Technical Report. We have serious concerns about 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 to complete work in the Willamette River supporting portions of the freeway that are designated for expansion as part of this project. Requiring bicyclists to leave existing paths or bike lanes to ride in mixed traffic detours during a five-year construction period would increase travel times and reduce safety.

After five years of construction, the Build Alternative would not offer compelling or substantial 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. Under the Build Alternative, the majority of bicycle trips through the project area would experience increased delays due to signalization, reduced connectivity, longer travel distances, and steeper grades compared to existing routes under the No-Build Alternative. The removal of the Flint Ave crossing, which currently supports the lion’s share of westbound bicycle trips from Vancouver Ave and the Tillamook neighborhood greenway into downtown Portland, would have a negative impact on bicycle travel that cannot be replaced by any of the facilities proposed in the Build alternative. The Hancock/Dixon crossing proposed by the project would not include any separate bicycle facilities and would be constructed at a permanently inaccessible 10% grade. The Clackamas bicycle and pedestrian bridge proposed by the project does not support this travel pattern, and would not replace any of the decreased utility of existing bicycle facilities impacted in the project area.

Many existing street design issues facing people bicycling and walking, 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 are touted as improvements over existing conditions, but build in problems that cannot be solved by any later design, such as the proposed two-way multi-use separated facility on the rebuilt Williams Ave crossing. Transitions back to one-way facilities on either side of the project area can only be achieved by additional signalization and accompanying increased delay. These design features do not belong on designated Major City Bikeways like Broadway/Weidler and Vancouver/Williams, which according to the Portland Transportation System Plan should be designed to “minimize delays by emphasizing the movement of bicycles.”

The proposed bicycle facilities in the I-5 Rose Quarter project fail to provide meaningful safety improvements, improve travel times for bicyclists, or encourage the desired city-wide bicycle mode splits. To reach the city's bicycle mode share goal of 25% adopted in the Transportation System Plan, permanent infrastructure at key regional transportation hubs like Albina must not only support existing bicycle travel patterns, but future growth. Directly in conflict with the City's goals, the Build Alternative would reduce the existing capacity of the bicycle network in the project area and place a permanent cap on the capacity for bicycle travel between downtown and North and Northeast Portland via the Broadway and Steel Bridges.

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 is incomplete without considering the effects of value pricing on the project area.
- Areas outside of streets on proposed freeway lids have been shown as green and landscaped public spaces, but lack accessibility. Portland Parks and Recreation has not been included as a project partner for programming and support of these areas after construction. The project has not demonstrated that the freeway lids will be designed to support the infrastructure necessary to meaningful public spaces in these areas, such as the depth of a growing medium necessary to support trees, or irrigation for landscaping.
- The Climate Change Technical Report, which appears to be a limited analysis on only freeway traffic rather than considering 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 found carbon emissions must be reduced by 50 percent by 2030, and to zero by 2050.
- While the I-5 Rose Quarter project has been billed as a 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 I-5 Rose Quarter project is a freeway expansion, and a failed attempt 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.

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  
Chris Warner, Interim Director, Portland Bureau of Transportation  
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