Portland Pedestrian Advisory Committee
1120 SW 5th Avenue, Suite 800
Portland, OR 97204

March 29, 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

CC: Portland Bicycle Advisory Committee
Portland Planning & Sustainability Commission
Chris Warner, Interim Director, Portland Bureau of Transportation
Joe Zehnder, Interim Director, Portland Bureau of Planning and Sustainability
Rian Windsheimer, ODOT Region 1 Manager
Oregon Transportation Commission
Metro Council

Re: ODOT I-5 Rose Quarter Environmental Assessment

As members of the City of Portland's Pedestrian Advisory Committee (PAC), we are submitting this letter in response to the I-5 Rose Quarter Improvement Project (I5RQ) Environmental Assessment (EA) published on February 15, 2019.

Following review and discussion of the Environmental Assessment (EA), as well as a briefing by ODOT and PBOT project managers, the PAC has identified several significant concerns.

Cumulative Impacts on Active Transportation & Low Mobility Users

- The proposed surface street improvements do not provide safety or connectivity benefits for pedestrians and bicycle users. Rather, due to the increase in signalized crossings, longer travel distances, and less direct access, non-vehicular trips (including public transit trips) would experience increased delays compared to current conditions. The local street designs also include numerous vehicle-centric features which present risks to the safety of active transportation users, including double turn lanes, expanded freeway ramps, and wide curb radii at intersections. These designs deprioritize pedestrians and bicycle users, which is in direct conflict with the City's Vision Zero, mode-shift, and carbon emission reduction goals.

- The project proposes removal of the Flint overpass, one of the busiest bicycle routes in the city due to its low traffic volumes and direct connection to NE Broadway, west of I-5. Neither the proposed Hancock-Dixon Crossing nor the Clackamas Bicycle & Pedestrian Crossing offer comparable connectivity to preferred bicycle or pedestrian routes. According to the EA, the Clackamas Crossing would actually increase bicycle delay to the Steel Bridge and the Eastbank Esplanade, a signature bicycle and pedestrian route.

- The PAC is particularly concerned about the proposed Hancock-Dixon Crossing's estimated 9-10% grade, which is not ADA compliant. The steep incline renders the bridge permanently inaccessible to pedestrians using mobility devices or those with limited mobility. The EA does not propose sufficient mitigations for this impact. Further, the construction of new non-ADA compliant facilities sets a negative precedent that rates access for vulnerable and low-mobility road users below that of vehicles.

- The proposed changes have significant design flaws that do not promote walking in what the committee aspires to be a dense, walkable neighborhood.

Air Quality & Public Health

- The PAC is concerned about the adverse public health impacts this project will have on those who live, work, and travel in the Rose Quarter. Multiple studies have found that pedestrians are significantly more affected by air pollution from engine combustion than those in vehicles. City plans, including the Albina Vision, call for dense residential and commercial development in the project area. The committee does not believe the EA fully addresses the potential that exposure to decreased air quality will have on pedestrians in this urban neighborhood expected to grow substantially in the coming decades.
- The proposed project area includes Harriet Tubman Middle School, a recently reopened elementary school in a neighborhood which has historically been negatively impacted by urban renewal projects, including the construction of I-5. The school's student body is 43% African-American and more than 70% underserved. The committee is concerned about the significant near and long-term public health impacts the proposed project will have on this particularly young and vulnerable population. An independent analysis conducted by Portland State University[1] warns that the air quality will be so dangerous as a result of this project that students should not be allowed to play outside. The EA does not adequately consider these impacts, nor does it identify sufficient mitigation measures to avoid long-term and irreversible harm to public health.

Gaps in Safety Analysis and Associated Methods

- One of the I5RQ project's primary goals is to improve safety in the project area. The Transportation Safety chapter of the EA cites ODOT crash analysis methods including the SPIS. The committee thinks that this methodology should be reviewed more closely. ODOT does not use the latest methods from the Highway Safety Manual, namely the use of an Empirical Bayes method, for understanding current safety conditions that help control for random events like crashes. Application of these methods would allow project staff to employ crash modification factors to show the change in crashes, by severity, expected in the Build Alternative. This would allow the public to understand how cost effective this project will be at reducing fatal and severe injuries and either justify or oppose the use of safety as a primary goal for this project.

1:https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/4/PSU_Tubmanfinalreport.pdf

- Additionally, it is of this committee's perspective that the current safety conditions are not severe enough to use the improvement of safety as the primary goal of the project. From 2011 to 2015, only one fatal injury involving a pedestrian crossing I-5 (1,114 statewide in that period) and six severe injuries (4,691 in that period) have occurred in the project area. The committee does not agree that these numbers warrant safety as the main has project goal.

- Finally, the EA does not consider the safety impacts of traffic generated from this project to conditions on surface streets. Any increase in traffic in the study area would lead to an increase in traffic on facility types. Any possible changes in fatal or severe injuries on these facilities should be accounted for in the EA. The committee believes that the project should use the 2016 ODOT crash file, the most current crash data available.

Exclusion of Congestion/Value Pricing

- The committee was surprised to find that the current EA excludes the potential impact on safety and operations from congestion/value pricing. ODOT and regional partners have been studying the impacts of congestion/value pricing on Oregon Highways, including the Interstate-5 corridor. Information from this work should be included in the EA, to determine how this policy could meet operations and safety goals. It is also important to consider how this project might influence any of the current congestion/value pricing options being considered.

Given these concerns, in particular the potential for long-term harm to vulnerable and historically marginalized populations, the PAC recommends ODOT complete a full Environmental Impact Statement (EIS). A full EIS will help the region better understand the public health, traffic safety, and environmental justice impacts of the project on local communities and identify effective mitigation options.

As the City's appointed advisory committee, tasked with providing input and perspective on how best to improve the pedestrian experience, the PAC requests representation on any steering committee established to inform the design of the I-5 Rose Quarter Improvement Project.

We appreciate the opportunity to provide feedback on the Environmental Assessment for this project.

Sincerely,

Brenda Martin
PAC Co-Chair