



A Joint Letter from the City  
Bicycle Advisory Committee & Pedestrian Advisory Committee  
1120 SW 5<sup>th</sup> Avenue, Room 800, Portland OR 97204

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June 23, 2022

To: Mayor Ted Wheeler  
Commissioner Jo Ann Hardesty  
Commissioner Mingus Mapps  
Commissioner Carmen Rubio  
Commissioner Dan Ryan

Subject: Comments on Interstate Bridge Replacement Project

The City of Portland, Oregon's Bicycle and Pedestrian Advisory Committees (BAC/PAC) are pleased to submit this letter to provide our feedback on the Modified Locally Preferred Alternative (MLPA) of the Interstate Bridge Replacement (IBR) Project. We understand the need for this project in the face of potential seismic upheaval in the near future, and appreciate that the IBR project team has stated their intent to build a multi-modal solution that will serve the region for the next hundred years.

An investment of \$3 -5 billion minimum projected cost must be in alignment with policies and goals outlined in the 2035 Comprehensive Plan, 2035 Transportation System Plan, Climate Action Plan, 2030 Bicycle Master Plan, and PedPDX. This project offers an opportunity to significantly improve bike and pedestrian facilities. The BAC and PAC would like to see the IBR as a revolutionary piece of design that makes walking, riding, or rolling across the Columbia River a destination experience in itself, rather than a terrifying crossing to be endured when absolutely necessary. We believe that this project could become a national model for successful integration of active transport into a major facility.

However, the current MLPA does little to accommodate, let alone center, active transport. We are also concerned that the IBR team is overengineering this project in a manner that will provide opportunities to restripe the road and create a second auxiliary lane – further incentivizing people

to drive. There has been conflicting messaging around whether tolling will be used to manage automotive demand, or merely as a means of funding the project.

Supporting adopted city, county, regional, and state goals for a dramatic reduction in greenhouse gas (GHG) emissions by 2045 requires the reduction of single occupant vehicle traffic, which will only be accomplished through an intentional strategy of creating viable transportation alternatives and ensuring that those who do drive pay for the infrastructure this necessitates, including the externalities of that behavior. We are fortunate to have concurrent work on tolling as part of an equitable mobility future being performed for the I-5 (and I-205) corridor, and we should employ the identified best practices through that project to ensure that tolling is done equitably here. However, truly equitable mobility must include a variety of high-quality, low-impact transportation options while also redressing the harm that highways and bridges have inflicted on surrounding communities in the form of air and noise pollution. The IBR presents a rare opportunity for a massive transportation investment to be a visionary yet practical symbol of change.

We believe the project can and should go much further to create safe, direct, accessible, and pleasant facilities for people walking and bicycling. Below, we describe our committees' minimum conditions of acceptance for the following areas of primary concern:

- **Transparency,**
- **Neighborhood Access and Design,**
- **Equity and Climate Justice,**
- **Bridge Design,** and
- **Performance Metrics.**

## **Transparency**

1. Our impression is that the IBR team has been reticent about the true impact of this project. This is evidenced in everything from the projected cost, which has curiously barely changed from when it was the CRC a decade ago, to the inclusion of only aerial mockups of the project area which gloss over the impact of height - something particularly important when evaluating walking, biking, and rolling facilities. City Council should insist on the following:
  - a. Updated cost projections and revenue analysis based on plausible tolling scenarios. The I-205 Corridor project is already \$120 million (31%) over budget before breaking ground on construction. Estimates from the IBR team have not been adjusted to account for the current environment or the passage of time.<sup>1</sup>
  - b. Pedestrian and bicycle facilities need to be shown in imaging from a vantage point near ground level.

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<sup>1</sup> "ODOT gets additional \$120 million for ballooning I-205 freeway expansion budget"  
<https://bikeportland.org/2022/04/29/odot-wants-120-million-more-to-build-i-205-freeway-expansion-project-352980>

- c. Widths of the main bridge span and overpasses along with proposed lane arrangements need to be clearly outlined. This should include any shoulder space, as the concern around restriping is centered around 12' wide shoulders and the ability to shrink them for another auxiliary lane.
- d. Assumptions around traffic volumes in both the build and no-build scenarios need to be clearly communicated.

## **Neighborhood Access and Design**

- 2. Throughout the project area, the plans should clearly provide:
  - a. Grade separation for low impact modes to provide the all ages and abilities routes outlined in our plans and policies.
  - b. Space for people walking and biking to minimize conflicts.
  - c. Livable noise standards - while this is next to a highway it should be possible to have a conversation without having to yell.
  - d. Plantings that will make any path more desirable and climate resilient through natural shade. These will mitigate the potential for a heat island effect and provide noise dampening.
- 3. Prioritize accessibility for the ADA and the broader community, both in terms of infrastructure design and treatments in the surrounding areas.
  - a. Improve wayfinding and directness for bicyclists - The current bike paths and routes leading up to the I-5 bridge in North Portland are confusing and often feel disjointed. Take this opportunity to improve bicycle connections and reinforce the idea that the bridge could be a destination, e.g., a key part of Portland's bicycle and pedestrian trail network.
  - b. Improve connections for pedestrians - This project provides the opportunity to upgrade pedestrian crossing and walking facilities from Portland to the bridge crossing and throughout the Bridge Impact Area.
- 4. Provide meaningful connections to the existing bicycle network in Portland for both recreation and commuting. The MLPA connects to Marine Dr. and a segment of the 40 Mile Loop and lists an Expo Dr. extension.
  - a. This requires a meaningful improvement to Expo Rd beyond the immediate project area. The current configuration is a two-lane, auto-centric, 35-MPH roadway with a narrow sidewalk, which is dangerous and insufficient for pedestrian or bicycle usage.
  - b. NE Martin Luther King Blvd was not explicitly included in the segments listed for improvement and connection. MLK Blvd needs to be a priority, as it represents a direct connection to the Neighborhood Greenway network by way of Vancouver Ave.
  - c. Connect on-the-ground conditions with Portland's Neighborhood Greenway network. Significant expense is planned to allow motor vehicle traffic to get to/from the IBR, and bicycle and pedestrian facilities should meet that same bar for access and safety. Improving these connections for active transportation users will both improve the areas around the bridge access points and increase the likelihood that the bridge can be a viable part of the daily commute for active transportation users – particularly as electric bicycles increase in popularity.

5. Connect Vancouver's overpass improvements to the rest of the network. East 4th Plain Blvd, 33rd St, and 29th St are all slated for "improvements" yet there is no adjoining infrastructure in any direction. This disconnect is particularly problematic for bicyclists, who rely on a low-stress, connected network for travel, and for whom current conditions are unsatisfactory.

### **Equity and Climate Justice**

6. Develop culturally-specific outreach plans to communities in and adjoining the project area. Plans should provide for iterative engagement and feedback throughout the lifetime of the project, not merely at inception. Ensure that these communities are engaged regularly, that they are compensated for their involvement, and that they receive direct feedback on progress related to their concerns.
7. Ensure the plan supports the State of Oregon's and the City of Portland's climate action plans. We are already working against the climate clock; this bridge must move us toward our climate goals if we are to have any integrity as a region or a generation of leaders.
8. Commit to honoring prior generations of people who stewarded this land before it became Portland and Vancouver. While related to #6 and #7 above, this point deserves its own area of intention.

### **Bridge Design**

9. Prioritize user experience and the separation of low impact modes from cars/trucks. This bridge must be a key part of the pedestrian and bicycle network in the region. Our vision must be big.
10. Ensure that the height of the bridge can accommodate the 8-80 year old cyclist and allow for wheelchair users to access the bridge without significant effort. Ensuring that the bridge height is relatively low should also mitigate the effect of crosswinds for users.
11. Incorporate best practices in the bridge design. We can learn both from examples of gorgeous bridges and those which do not serve all users well. This committee should develop a plan of outreach and collaboration with other designers and planners from the region who are willing to share their institutional knowledge and decades of experience.

### **Performance Metrics**

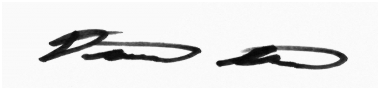
12. All metrics developed for this project should be reported frequently (at least annually) and transparently. Ideally, the project would develop a public-facing site where the most recent reports could be accessed. Reports should be focused on actual conditions and should incorporate qualitative data gathered from community members.
13. All metrics should be reported throughout project development and construction, and following completion.
14. Performance metrics should be developed to monitor at least the following:
  - a. Pedestrian and bicyclist safety and access
  - b. Reduction of motor vehicle emissions including GHG and fine particulates from brakes and tires
  - c. Noise levels for surrounding neighborhoods
  - d. Reduction of single occupancy trips

- e. Usage of active transport and mass transit

**Conclusion**

The BAC/PAC are hopeful that City Council will heed this advice and incorporate these conditions into any ordinance that would seek to accept the MLPA for the IBR. We would like to thank the IBR project team for briefing our committees on this project. We hope and expect that this engagement will continue as the project moves into design. There are many positive aspects to the project, and we are confident that the issues raised in this letter can, and will, be addressed.

Signed,



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Portland Bicycle  
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