



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

March 17, 2021

To: Multnomah County Bridge Services Section
Burnside Draft EIS
1403 SE Water Avenue
Portland, OR 972124

Subject: Comments on Earthquake Ready Burnside Bridge DEIS

The City of Portland’s (Oregon) Bicycle and Pedestrian Advisory Committees (BAC/PAC) are pleased to submit this letter in response to the Earthquake Ready Burnside Bridge Draft Environmental Impact Statement (DEIS). There is much that we support about the project, including the need for a seismically resilient crossing of the Willamette River in Downtown. This letter, however, concentrates on where we believe the project can be improved. In particular, we believe that an investment of this scale should do more to meet adopted city, county and regional goals than merely “not directly affect long-term transportation greenhouse gas (GHG) emissions”¹; it should—and must—play a part in reducing them.

There are three main areas where we believe the project could do more, while still meeting the Purpose and Need for the Project. These are: allocation of space on the bridge; connections to the pedestrian and bicycle network at each end of the bridge; and provisions for pedestrian and bicycle access during construction.

Allocation of space on the bridge

The BAC/PAC welcomes the increased space for people on bikes, on foot or rolling at the midspan of the short span/long span options. Existing 5.5’ wide bike lanes would increase to 8’ wide; 7.3’ wide sidewalks would increase to 8’ wide². There would be a 2.5’ wide buffer between bicycles and pedestrians. Active transportation lanes would also be protected from traffic, with room for barriers. This represents a substantial improvement over the status quo, and indeed over other bridges in the city.

We are, however, concerned that the generous space at the midspan is reduced at the east and west approaches, where the proposed cross sections provide less room for active transportation *than currently exists*. This is likely to be a particular problem at the Portland Rescue Mission, where sidewalks are well

¹ Earthquake Ready Burnside Bridge - DEIS - Executive Summary, page S-23

² Earthquake Ready Burnside Bridge - DEIS - Project Alternatives, page 2-9

used by people utilizing the social services provided.

This reduced width at the approaches appears to be for the purpose of providing a) turning lanes and b) wider vehicular lanes than currently exist. The provision of wider lanes than currently exist is of particular concern, given that speeding is already a significant issue on the bridge. According to the National Association of City Transportation Officials (NACTO)—of which both the City of Portland and TriMet are a member—10 feet should be considered adequate:

Lane width should be considered within the overall assemblage of the street. Travel lane widths of 10 feet generally provide adequate safety in urban settings while discouraging speeding. Cities may choose to use 11-foot lanes on designated truck and bus routes (one 11-foot lane per direction) or adjacent to lanes in the opposing direction.³

Given that there are buffers proposed at the center of the bridge and at the edge, it is unclear why wider lanes would be needed.

Most significantly, we are concerned that the project makes no active provision for transit in the westbound direction. In February 2020 the Portland City Council voted unanimously to adopt the Rose Lane Project Report, which identified the westbound Burnside Bridge as a “Potential Future Corridor [for a bus lane] in Partnership with Other Agencies”⁴. The report identified a Bus and Turn (BAT) lane on NE Couch between MLK and NE 12th (leading to the Burnside Bridge) as a Phase 1 project. The City is currently doing public engagement on this. As noted in the Transportation Technical Report⁵, the Rose Lane Project Report and its recommendations are Reasonably Foreseeable Future Actions under NEPA and it “is likely that the majority of the proposed Rose Lane network will be implemented by the future year date.”⁶ Given this, it is unclear why the project is only providing *provision* for a westbound transit lane, rather than including it from the start.

Providing a bus lane on the replacement bridge, from the day that it opens, will help make lines 12, 19 and 20 faster and more reliable, meeting many adopted City and County climate goals. A bus lane in the westbound direction would also better help the project achieve its goal of seismic resilience. If other Willamette River bridges are unusable after an earthquake, numerous bus routes will need to be re-routed to the Burnside Bridge. With fewer crossings over the river available, high capacity transit such as buses will need to play a greater role in getting key workers to and from their jobs.

There will never be a better time to add a westbound bus lane to the Burnside Bridge than when it is being reconstructed. After four and a half years without a bridge, drivers will have adjusted to the loss of the existing route. If the bridge reopens with four general purpose vehicular lanes, the ‘loss’ of a lane for vehicular traffic at an unspecified time in the future will be felt more acutely than if the bridge reopens with three lanes.

Connections to the pedestrian and bicycle network at each end of the bridge

The BAC/PAC welcome improvements in access between the bridge and the pedestrian and bicycle

³ “Lane Width.” NACTO, accessed March 8th, 2021, <http://nacto.org/publication/urban-street-design-guide/street-design-elements/lane-width/>

⁴ “Map 5: Rose Lane Project Corridors And Spots.” Rose Lane Project Report, <https://www.portland.gov/sites/default/files/2020-06/rose-lane-plan-final-2.13.2020-low-res.pdf>

⁵ Earthquake Ready Burnside Bridge - DEIS - Transportation Technical Report, page 4-4

⁶ Earthquake Ready Burnside Bridge - DEIS - Transportation Technical Report, page 6-7

network at either end of the bridge, identified in the Active Transportation Memorandum.

At the east side of the bridge, all options represent an improvement over existing conditions. We are glad that earlier options that only provided access to one side of the bridge have been dismissed. We are concerned, however, that only options with an elevator *or* ramps are being considered⁷. Given the significant height difference between the Esplanade and the bridge deck, elevators would be very helpful for people with mobility issues, and as such we do not want to see the project rely on ramps alone. However, ramps better serve people who are cycling, and who may not wish to wait for an elevator. Furthermore, other Portland area bridges with elevators, such as the Darlene Hooley Bridge, have seen extended closure of their elevators—and it is hard to imagine that an elevator would be in service immediately after a major earthquake.

At the west side of the bridge, we support the in-kind replacement of the existing stairs (where space constraints preclude a ramp) and new ramps on the south side⁸. We prefer the options at the Mercy Corps Site (Options 4 and 5) over the Saturday Market Admin Site (Options 2 and 3). The Mercy Corps Site provides the same access to the MAX station, with better access to Naito Parkway. We prefer the first layout due to the lesser grade on the ramps, which will be easier for people with mobility issues to use. Placing ramps on the Mercy Corps Site makes future redevelopment of the Saturday Market Admin Site and adjacent surface parking lot more feasible; an important consideration in ensuring a more pedestrian friendly and transit oriented Old Town.

At both the east and west sides of the bridge we support options that provide signalized crossings of the bridge. Any staircases should have robust bicycle gutters incorporated into them.

Pedestrian and bicycle access during construction

The BAC/PAC recognizes that a project of this scale cannot be undertaken without disruption. A key east-west route will be closed for four and a half years if no detour bridge is built. Given this disruption, it is important that the project does not have a compounding effect on travel in the north-south direction. Closures should be limited in duration, and, when necessary, detours should be of the highest quality.

We are particularly concerned about the 1.5 years of cumulative closure of the Eastbank Esplanade (for the long span alternative) or 2.5 to 3 years for all other alternatives.⁹ This is in sharp contrast to I-5, where work is described as being “generally... limited to night work during the week and pre-determined, limited weekends.”¹⁰ Closures of a major piece of Portland’s active transportation network should not be taken any more lightly than closing more automobile focused pieces of the road network.

When closures to the esplanade do need to occur, detours for people walking, rolling or cycling should be short, direct and of as high a quality as possible. Simply directing people to the existing MLK/Grand Corridor or 7th/Blumenauer Bridge would create a significant travel disruption, on corridors with a much higher stress level than the Esplanade. The project should provide mitigation for closures, such as building out the bicycle network on SE Water Ave¹¹ and SE/NE 7th Ave¹², as planned by Central City in

⁷ Earthquake Ready Burnside Bridge - DEIS - Active Transportation Memorandum, pages 2 to 8

⁸ Earthquake Ready Burnside Bridge - DEIS - Active Transportation Memorandum, pages 14 to 18

⁹ Earthquake Ready Burnside Bridge - DEIS - Construction Approach Technical Report, page ES-2

¹⁰ Earthquake Ready Burnside Bridge - DEIS - Construction Approach Technical Report, page 35

¹¹ “Project 14 | SE Water / Stark / 3rd.” Central City in Motion - Final Implementation Plan, page 46
<https://www.portlandoregon.gov/transportation/article/702575>

¹² “Project 3 | NE / SE Grand / 6th / 7th.” Central City in Motion - Final Implementation Plan, page 46

Motion. The project team should also investigate whether all or part of the ODOT access road between I-5 and the UPRR tracks could be used as an active transportation detour, in addition to its planned use as construction road¹³.

Any closures of the Eastbank Esplanade should be planned so that they do not coincide with closure of Naito Parkway on the other side of the river.

Conclusion

The BAC/PAC would like to thank the project team for briefing us multiple times in advance of the release of the DEIS. 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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<https://www.portlandoregon.gov/transportation/article/702575>

¹³ Earthquake Ready Burnside Bridge - Draft Environmental Impact Statement - Construction Approach Technical Report, page 5