

Portland Bicycle Advisory Committee

Working to Make Bicycling a Part of Daily Life in Portland

1001 SW 5th Avenue, Room 1300
Portland OR 97204



November 13, 2024

To: Millicent Williams, Director, Portland Bureau of Transportation
Priya Dhanapal, City of Portland Deputy City Administrator
Public Works Service Area

Cc: Caitlin Reff, Brenda Martin, Roger Geller; PBOT staff

Ensuring our lifeline transportation routes are seismically sound to support emergency services and evacuations is of critical importance for ensuring the safety of all Oregonians in the event of a major earthquake. We have greatly appreciated both the Interstate Bridge Replacement Program (IBR) Team and City staff attending Portland Bicycle Advisory Committee (BAC) meetings to present on project milestones, discuss questions and concerns and invite comments, including most recently for publication of the Draft Supplemental Environmental Impact Statement (DSEIS). This is an opportunity to create a landmark connection at the gateway to Oregon that will represent our shared values for centuries to come.

As detailed within this letter the BAC has several recommendations to address at least some of the many deficiencies identified within the DSEIS.

1. Shift the location of active transportation facilities, particularly on the bridge itself, to be in alignment with the MAX extension. This is to provide additional separation from the many negative externalities of autos and gain the many benefits of having direct station access for people riding bicycles and walking without having to engage in, at times, significant out of direction travel. Ideally this would provide access starting from the Expo Center continuing to the northern terminus.
2. Add resting and/or observation areas on the shared use path (SUP) to both make the facility easier to use and provide spaces for people to enjoy the unparalleled views that will be available.
3. Utilize markings within the SUP to separate downhill bicycle users from pedestrians and uphill bicycle users. The speed differential could be significant and having a wide, unmarked space provides plenty of opportunity for conflict.
4. Develop a mechanism that connects to the street grid with less out of direction travel from the bridge on the Washington side of the river. The current helix ramp is excessively long and will be a significant barrier to access.
5. Include world class connections to make use of the active transportation facilities being built with this project. Their intentional omission by the arbitrary project area is disappointing and likely hinders the ability for this project to be successful from an active transportation utilization perspective before the first shovel breaks ground.
6. Perform an actual analysis of the changes in crash types with the LPAs presented so all stakeholders have a better understanding, based on similar changes built conditions, of how crash numbers AND severity will be addressed. Adding the word "safety" to shoulders is not a valid solution.
7. Utilize a more responsible definition of congestion in traffic analysis that respects current speed limits and safety objectives. A 5 mph slowdown where a 50 mph speed limit exists on a bridge is not sufficient justification for the type of infrastructure expansion being proposed.

The BAC advises City Council and City bureaus on all bicycling-related matters and thus has a role in bicycle planning, design, and implementation activities, as well as supporting efforts to improve safety and comfort for all people riding bicycles throughout Portland. It is in this capacity that we are writing to you to express our disappointment that the conceptual project design in the DSEIS does not reflect the City's Transportation System Plan goals to improve the livability of Portland by: supporting Vision Zero, limiting traffic congestion, reducing carbon emissions and promoting healthy lifestyles, spending less on vehicles and fuel and creating great places.

Mobility

WSDOT has expanded I-5 and I-405 in the Seattle metropolitan area to a grand degree, yet the region is plagued by congestion by every measure. Our freeway widenings have had similar fates. We continue to spend billions of dollars

on highway investments that evidence has shown nationwide to induce demand. Even if this project did solve congestion in the project area, which is staggeringly unlikely, the back-up will only move south where the highway is still constrained. What this will lead to is more billion dollar projects to add auxiliary lanes to the split of I-405 and then the full I-5 Rose Quarter project that is still \$1.5 billion short of being funded.

Further, the definition of congestion at anything 45 mph or lower is dangerous and reckless. The mobility policy adopted in Metro's Regional Transportation Plan uses a measure of speeds of 35 mph for more than four hours. Using a higher measure results in an outcome that is financially irresponsible and sets an untenable precedent. With speed limits that vary between 50 to 60 mph throughout the project area, this definition means a slowdown of 5 mph is worthy of billions of dollars in intervention. Yet at the same time, there are many locations in the project area and Portland where the most vulnerable road users, often from the most marginalized communities, are lacking protected or even any facilities.

There are numerous reasonable and responsible reasons for traffic to slow down including weather, construction/road work, vehicle(s) on the shoulder, and vehicles merging on and off the highway. Small changes in speed for these reasons should not be a reason to claim there is congestion and by doing so it encourages a much more robust and expansive Locally Preferred Alternative that looks more like a construction company fever dream in Texas or Florida rather than a responsible and restrained project that acknowledges that single occupant vehicles should not be further encouraged for reasons including safety, greenhouse gas emissions, microparticle emissions from brakes and tires, lack of affordability for a society dependent upon auto ownership, and insufficient resources for maintaining current transportation facilities.

Safety

This project fails to address the current safety issues within the IBR project area, even though this project provides a significant opportunity to do so. The rigid definition of congestion creates an incentive to design unsafe driving conditions by encouraging "driv[ing] a vehicle on a highway at a speed greater than is reasonable and prudent under the conditions" in violation of RCW 46.61.400 (Washington Basic Rule) and ORS 811.100.

The increased speeds that, while unlikely, are projected by building this project as a result of reduced congestion would result in a higher number and proportion of deadly crashes. By claiming that congestion can happen with as little as a 5 mph drop in speed, this project is supporting the kind of behavior that led to the deaths of over 586 people in Oregon last year (328 of which were on ODOT facilities). Based on ODOT's Crash Data Systems, the second and third leading causes of crashes were roadway departure and speed-related respectively, neither of which will be solved with a freeway that is more than double the current size and engineered for people to travel at unsafe speeds in service to relieving congestion.

IBR staff were not able to provide any breakdown of how the types of crashes would change as a result of any LPA on the table during the BAC presentation. Crashes of all types are bundled together when claiming that this project will result in safer conditions even though serious and fatal crashes are the focus of the City's Vision Zero program and Metro's regional safety goals. IBR staff did not provide any proof or cite any data from other similar roadways to confirm the assertion that serious and fatal crashes will be drastically reduced if the total number of crashes are reduced. The projected increased speeds makes it unlikely this is the case. If the forecasted "congestion relief" fails to materialize then the crashes being prevented are of the low speed variety that more often result in vehicle damage instead of bodily harm and do not merit the expenditure of billions of additional dollars as part of this super-sized project.

Climate

Measuring emissions without any climate related goals communicates the lack of seriousness that the IBR DSEIS places on one of the core project goals. Pollution driven by increased vehicle miles traveled (VMT) expected as a result of the project goes well beyond the stated purpose and need for a replacement bridge that is centering travel by automobiles while merely tolerating every other mode of travel in its design.

This project claims to address climate change by reducing congestion. However, that assertion ignores advances in ICE technology in the last 50 years that have made vehicles more efficient in traffic and at lower speeds. Further, we

know that maximizing transportation choice is the key to reducing congestion, while widening always has the opposite effect eventually. In fact, the slight increase in overall river crossings with the DSEIS project as compared to the no-build is testament to this fact.

A higher proportion of vehicles are assumed to be electric rather than internal combustion (ICE), but the analysis fails to account for the increased vehicle tonnage due to batteries, along with the environmental damage and carbon emissions associated with the mining and manufacture of those batteries, and larger dimensions as vehicle sizes and weights continue to grow. A more complete analysis would reveal the marginal benefits of this shift lessen or even negate these anticipated greenhouse gas emissions savings.

Bicycle and Pedestrian Infrastructure

More separated space for people riding bicycles and walking as part of a new bridge design will be a huge improvement over the facilities that exist today. However, many critical elements of the active transportation facility design that contribute to rider experience are lacking - with people walking and bicycling as an afterthought (rather than a focus). This is likely why even with both a new mixed-use facility and light rail extension as part of the bridge we only see a slight decrease in the number of people driving with the project (though also induced demand as highlighted below).

We remain concerned about the elevation changes in the LPAs. While all of the options are technically ADA compliant, having extended elevation gains still represents a barrier that has not been adequately addressed. There was no identifiable discussion of flat rest or observation areas that could be utilized to break up the elevation gains or otherwise gain respite out of the flow of travel for people walking or biking in the SUP. The elevation gains and losses are also concerning because the downhill portions on bicycles represent opportunities for large speed differentials and with 25' to work with there is a need to provide cues for all users to prevent conflicts. We would recommend the use of signage, paint, and textured materials to safely and consistently guide all users to the proper areas of the SUP they should be utilizing based on how they are traveling. Allowances for shy distance on bicycles will be important to incorporate as well in future design and implementation.

The helix ramp is of particular concern. First for the increased distance it adds to the trip. Just the bridge and ramp length alone make this a long trip for cyclists, not to mention that most people who use it live or are accessing destinations that are also some distance away. A solution that provides a straight shot for driving and a meandering path for people walking and bicycling around it is not how we encourage people to select the most vulnerable modes toward our climate and congestion goals. Second the safety challenges it poses due to descending bicyclists likely traveling much faster than people biking uphill or walking. As any mountain biker knows, there are limits to the brakes on our vehicles related to hills (similar to freight which we design safeguards for). A heavy hand can send you over the handlebars or, in the wrong weather conditions, skidding. For increased safety of all SUP users, we recommend “[c]o-locating the shared-use path with the proposed Waterfront Station to provide additional elevator access down to Columbia Street/Columbia Way” as is outlined in 4.8.2.1 of the Transportation Technical Report. We also further encourage the IBR Team to identify more productive ways to connect downtown Vancouver facilities with the Interstate Bridge while avoiding seemingly endless loops.

In prior visits to the BAC, members have voiced concerns about proposed active transportation facilities having similarities to what exists on the Glenn Jackson Bridge (I-205 crossing of the Columbia River). That facility is a SUP that is in between the north and south bound lanes making it extremely uncomfortable, deafeningly loud, and difficult to breathe. The LPAs for the IBR provide a range of options, however they are all similar in that they will be located relatively close (14-24') to vehicles traveling 50+ mph which will result in significant noise and debris from cars and crashes and poor air quality from particulate matter. This again is not how we will encourage people to leave their comfortable cars to travel by bicycle or how we achieve environmental justice for marginalized communities that do not have the choice. We are dismayed that the location of the SUP doesn't take advantage of the planned light rail extension. Co-location, with the SUP to the west of the MAX line, rather than the current east side alignment, would provide a greater degree of separation from the noise, debris, and pollution from cars. Integration of first and last mile mode access with transit would link these systems, making them complementary rather than exclusive to each mode. It would allow for better connectivity and increase options for people using transit to access Hayden Island and Downtown Vancouver.

Going beyond the bridge itself, the IBR is an expansive project covering roughly five miles of I-5 and numerous on and off ramps and overpasses. The project area seems to have been selected to maximize the amount of construction that could be performed to “solve congestion” for the highway. It leaves bicycle connections unresolved in particular and in the hands of local jurisdictions that are not able to bring commensurate financial resources to the table. This is a mistake. The connection to MLK Jr Blvd is a particular concern worth spotlighting. While the IBR project area will have bicycle facilities that are generally good, they will then connect with infrastructure that ranges from decent to missing. We cannot build bike lanes to nowhere and expect people to use them (and decry when they don't). There aren't many opportunities to bring major federal investments into Portland and there are even less funding opportunities for active transportation projects. This project has a responsibility to complete the network gaps that make it possible for people to walk and bike safely and comfortably between North Portland and downtown Vancouver.

In Washington, the on and off ramps the project will build are so extensive that it balloons the footprint of I-5 to roughly 14 lanes (based on illustrative videos that the IBR Team has posted to YouTube). That comes with a price tag large enough to build out a significant portion of Portland's entire 2030 Bicycle Master Plan which would result in far more congestion relief, safety improvements, and environmental benefits. In this case, why are we not including broader network investments for people walking and bicycling on the Oregon side? Why is the City of Portland responsible for finishing the network connections? While many of the facilities could be considered world class due to the low bar for that classification and the care given to bicycling and walking within the project area we are aware that only in conjunction with world class connections will this infrastructure be activated. By omitting many of the connections by excluding them from the project area and leaving local jurisdictions holding the bag the IBR project will fail to realize the active transportation usage necessary to make bicycling as attractive as driving.

Funding and Priorities

ODOT's funding outlook is bleak. Without tolling revenues, there is not money to pay for the suite of megaprojects that make up the majority of ODOT's investment portfolio. IBR will focus billions on a single span that will inevitably be used to justify further megaprojects in the span of I-5 between IBR and I-5 Rose Quarter. Yet, this project provides the framework to financially cripple ODOT's ability to:

- address the large backlog of failing bridges throughout the state;
- fill vast remaining active transportation implementation gaps;
- address the many deadly safety issues that exist on state roadways, particularly urban arterials; and
- maintain the roadways it owns (for example, in 2023 ODOT did not have enough money to maintain snow plowing in the passes through the Cascades).

Ironically this project also promotes continued widespread tax evasion by Washington residents who have long used the easy access to the Jantzen Beach shopping center to avoid the ~10% sales taxes of Vancouver and Clark County. The limited direct access from I-5 only to/from Washington adds unnecessary complexity and expense to this project.

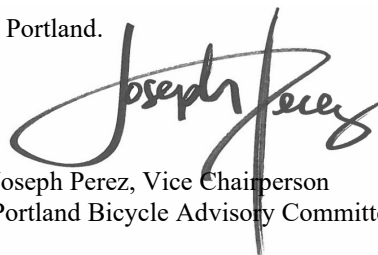
We appreciate that this project will provide much needed safety and comfort improvements compared to the current conditions on the I-5 bridge. We are very grateful to City staff for their continued engagement with us to try and shape this project. We look forward to continuing this engagement as the project moves into design.

However, this major regional project can and should do much more. We are hopeful that the IBR Team is receptive to our advice so that we will see our City and regional visions reflected in the final DSEIS concept.

Thank you for your time, consideration, and all that you do for Portland.



Jim Middaugh, Chairperson
Portland Bicycle Advisory Committee



Joseph Perez, Vice Chairperson
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