

April 1, 2019

Megan Channell
Oregon Dept. of Transportation
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Emily Cline
Federal Highway Administration
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Re: I-5 Rose Quarter Improvement Project Environmental Assessment Comments

Dear Ms. Channell and Ms. Cline:

Thank you for the opportunity to review and comment on the I-5 Rose Quarter Improvement Project's Environmental Assessment. We congratulate ODOT and FHWA on completion of this well-organized document that strikes a balance between accessibility and thoroughness.

This memo summarizes Metro staff's technical review of the EA and project documents. Rather than document all positive and critical comments, this memo focuses on major questions and concerns in the interest of brevity. In particular, Metro staff believes the EA is inadequate in its evaluation of serious crashes, including documentation of existing conditions and an analysis of how the alternatives compare on reducing serious crashes. This inadequacy means that project designs that can reduce deaths and life changing injuries are not being evaluated, despite direction from federal, state and regional policies.

Metro staff also recommends development and evaluation of new design concepts for the highway caps and a segment of Broadway, and has requests and recommendations related to transportation including clarification of analysis, evaluation of different design concepts, and consideration of additional mitigation measures.

Agency Coordination

- The process for releasing the full documentation and analysis within a 45-day review period without any prior review opportunities of technical work did not allow for a full review of the analysis by Metro staff. As the designated Metropolitan Planning Organization for the Portland region and the administrator of the region's urban growth boundary, Metro staff believes our agency should have been afforded the same opportunity as the City of Portland for prior review of technical reports on land use and transportation. Metro staff's comments are therefore based on a high level review rather than a complete understanding of the work.

Project Alternatives

- There are reasonably foreseeable options to the proposed highway caps that were not explored in the design concept screening process, such as reinforced caps or a tunnel-type structure that could support some forms of development. With more robust construction, capped areas could potentially support low-density construction that could activate what might otherwise be vacant, underutilized spaces; a tunnel-style treatment could potentially support more intensive development that would have a more transformative effect on the district. Further exploration of these design concepts in the environmental process is recommended.

- If more robust cap designs are evaluated as recommended, mixed-use development above the highway would be consistent with goals of the City of Portland's N/NE Quadrant Plan, which specifies zoning the capped areas for "mixed commercial, employment, (or) residential; scale varies" with building heights ranging from 2-10 stories. There is no discussion of the potential for structures on the highway caps in the EA, either in the preferred Build Alternative or the other explored alternatives. Metro staff recommends the project's environmental documentation either evaluate such development under NEPA or state that development of these air rights is not a federal action and therefore not subject to NEPA.

Environmental Justice

- The analysis fails to address whether the properties displaced by the project are facilities that serve or employ low-income or minority populations.
- The analysis should clearly define any changes in emissions including diesel and greenhouse gases to neighborhoods along the I-5 corridor from North Portland to the South Waterfront/Lair Hill area.

Land Use

- There is insufficient information about how well the proposed highway caps will functionally meet the City of Portland's adopted land use plans. Metro staff believes ODOT and FHWA should better document how the proposed design will provide public open space that offers genuine opportunities for "recreation, relaxation and respite" including details on management and maintenance of these spaces and air quality and noise levels on the caps.

Safety

- The EA analysis does not adequately address serious crashes, which is inconsistent with federal, state and regional policies to eliminate serious crashes. Oregon has adopted a safety target of achieving zero fatal and serious injury (Injury A) crashes by 2035 (Oregon Transportation Safety Action Plan, 2016). The Portland region also has an adopted Vision Zero target for 2035 (Regional Transportation Safety Strategy, 2018). Federal safety performance targets track crash rates for fatal and serious crashes. Focusing on comparing crash rates for all crashes to statewide averages for freeway segments - the majority of which are property damage only and minor injury - is not consistent with a focus on reducing fatal and serious injuries.
- While the EA states that the "segment of I-5 between Interstate 405 (I-405) and Interstate 84 (I-84) experiences some of the highest vehicle crash rates in Oregon" it does not provide information on how the project area compares for serious crashes. Metro staff is not aware that the project area is an area of concern for serious crashes when compared to statewide averages.
- The EA does not include information on how the Build Alternative will reduce the number and severity of serious crashes occurring
- As indicated in Safety Technical Appendix B, the one fatal crash between 2011 and 2015 involved a pedestrian on the freeway. There were two similar crashes involving pedestrians in 2009 and 2010, outside of the study time frame, indicating a pattern rather than a random occurrence. The EA does not address this fatality or describe how the alternatives would address preventing fatalities of this type in the future.

- The information in Safety Technical Appendix C is inadequate to determining if the Build Alternative would address serious crashes at intersections.
- EA Page 6 states that, “it is estimated that there would be approximately 10 percent more highway crashes under the No-Build Alternative as compared to existing conditions (ODOT 2019a).” This analysis lumps together all crashes and does not clarify whether the Build Alternative would improve serious crashes.
- The EA does not investigate the relationship of time of day with crashes, especially serious crashes, which could impact design decisions. Not evaluating the relationship of congestion to overall crash rates and serious crash rates raises questions about the design solutions identified to address crashes, which are described as addressing congestion and safety simultaneously.
- Behavior is cited as a primary factor in all of the serious crashes – following too close, not paying attention, aggressive driving, speeding and alcohol. It is not clear how the design solutions in the Build Alternative will address behavior.
- EA Page 73 notes that “lower crash rates on I-5 would occur under the Build vs. the No Build Alternative due to less stop and-go traffic and emergency braking, new auxiliary lanes providing drivers more time and space to merge, and new shoulders providing more room for disabled vehicles.” While rear-end crashes occurring under congested conditions could benefit from the Build Alternative, it is not clear how serious crashes occurring in less congested conditions or serious crashes with behavior as a primary factor in the crash will be addressed.

Transportation/Design

- The EA states (section 3.2.2) that the project does not create new capacity or add substantial capacity to I-5. This statement is not objectively true and is potentially misleading; auxiliary lanes clearly add capacity, which can be calculated using Highway Capacity Manual procedures and other traffic analysis tools. Further environmental documentation could state the estimated change in link capacity if there is a need to document the scale of the change.
- The width of Broadway between Williams and 1st is shown as five (5) one-way motor vehicle lanes, which is incompatible with a multimodal, mixed-use environment, and may increase in poor driver behavior. Metro staff requests alternatives to this configuration be developed and further evaluated.
- The angular nature of the lid design relative to the street grid results in sidewalk segments with a very large buffer from the freeway below, and sidewalk segments that may lack any buffer. Metro staff recommends consideration of new lid designs that include landscaped buffer for all sidewalk segments in order to create effective pedestrian environments.
- The EA does not document whether the project considered the feasibility and cost of retaining both Hancock and Flint as overcrossings. Metro staff requests this scenario be evaluated for consideration.
- Since the full four-step travel demand model was not used for the project analysis, it is not clear whether the projected increases in VMT capture all the impacts of the project, including changes due to mode shift to motor vehicles. The limited subarea provided for review does not make it clear if the VMT analysis includes consideration of the regional system or simply reflects re-routing of vehicles within the limited subarea.

- Metro staff requests clarification on the assumptions used in forecasting the project's impacts on regional tripmaking and the resulting effect on overall trip patterns including mode share.
- The evaluation of construction impacts does not include consideration of access for walking, bicycling, transit, and driving during construction of the project. Metro staff requests the project document how construction-period access will be addressed.
 - Metro staff recommends the final Clackamas and Hancock bridge designs include direct connections without switchbacks on both sides, as well as consideration of stairway connecting Clackamas to Wheeler to allow more direct non-ADA pedestrian access.
 - Metro staff recommends the project include a southbound bike lane on Williams between Broadway and Wheeler, to best connect with the Rose Quarter Transit Center and Moda Center.
 - Metro staff requests clarification on how the signalization at Williams and Hancock would move bike riders from the right side to the left side, and how bike riders on Vancouver would transition from the right side of the street to the left side prior to Hancock.
 - The project appears to remove a sidewalk on the west side of Vancouver north of Broadway, which would degrade the pedestrian environment on Vancouver. Metro staff requests the project retain that sidewalk and connect it directly to the crosswalk on the north side of Broadway.
 - The EA indicates that bus and streetcar performance will be slowed due to signal phasing changes. Metro staff requests FHWA and ODOT consider additional ways to mitigate this impact, including the consideration of BAT lanes, transit only lanes, and signal modifications (including TSP) on Broadway and Weidler.

Economy

- The Executive Summary and Cumulative Impact Analysis of the Socioeconomics Technical Report indicates that community engagement events were held that discussed government services, economic opportunity, gentrification, historical injustice with past developments, agency distrust, and broken promises with development initiatives. Metro staff requests the project document how it plans to address these concerns; that effort could be jointly developed with the City of Portland.
- Relevant economic information from Metro's Economic Value Atlas is included on an attached page. FHWA and ODOT may find this information helpful.



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General

- Future environmental review and project documentation should reference the recently adopted 2018 RTP. The EA's references to the 2014 RTP are appropriate because that is what the NEPA analysis is based on.

If you have any questions or would like to discuss any of these in more detail, please contact me at elissa.gertler@oregonmetro.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Elissa Gertler".

Elissa Gertler
Director of Planning

I-5 Rose Quarter Improvement Project EA – Economic information from EVA

Metro's [Economic Value Atlas](#) provides an indication of tract-level conditions when it comes to these economic values. An assessment is provided below regarding the primary census tract for the API (Lloyd District tract). This information may be helpful for the project and its environmental review.

- **Job Activity + Target Industries:** Existing jobs in the census tract of the project area (18,600) are significantly higher than the average tract in the region (2,300). Area job growth over the last ten years (31%) is slightly lower than the average tract in the region (34%). The project area has a large number of goods-producing jobs (500) relative to the regional average (270) and there is a balance between both other tradable industry jobs (9,500) and local service/government jobs (8,600) with more than six times as many of these jobs than other areas of the region. The average size of business establishments (23 employees) is more than two times higher than other areas (10 employees). The project area also has high concentrations of jobs in three out of the six industries that Greater Portland Inc. targets for growth in the region. More than fifteen times as many clean tech jobs, four times as many software and media jobs, and two times as many athletic and outdoor industry jobs than the average tract. The area has few-to-none computer and electronics industry jobs and health science and technology jobs, but there are a fair number in metals and machinery (31 jobs) relative to the average (36 jobs).
- **Market Connectivity:** Average travel times to exit and entry points of the highway system in the project area (40 minutes) are less than the average tract (47 minutes) and the area's access to PDX airport (18 minutes) is much better than most areas of the region (28 minutes). To the extent that the project increases commute-time speeds and reduces travel times on I-5 without inducing additional demand, the improved access to exit/entry points of the highway system and PDX could offer some minor benefit to market connectivity for goods and people for those areas of the region that rely on this stretch of highway as a pass through connection or local connection to outside clients and customers.
- **Labor Access:** Workers with a BA make up a large share of area workforce (48%) relative to the average (37%), but the number of highly educated workers living in the immediate area (900) is less than the average (1,200) and there are almost half as many workers with some college and four times less entry-level workers than the average.
- **Job Access:** There are almost two times as many jobs within a 30 minute commute (940,000) relative to the average tract (570,000 accessible jobs).
- **Economic Inclusivity:** The I-5 Rose Quarter Improvements Project falls in a project area with a long history of economic injustice. The poverty level is 28%, more than double the 13% average. Area median income growth (11.6%) is slightly higher than the average tract (10.7%), but the gap between high and low-income earners (0.47 GINI coefficient) is also higher than the average tract (0.41 GINI coefficient).
- **Racial Diversity:** The project area is slightly more diverse (17.4% that are people of color) than the average tract (13.6%), but the area is getting less diverse (2% decline in % people of color) relative to a slight increase (0.8% growth) in other areas of the region.

- **Developability:** The existing base of industrial and commercial square footage in the census tract for the project area (9,615 SF) is close to four times the average tract in the region (2421 SF). The Buildable Lands Inventory indicates that there are 28.5 acres of buildable industrial or commercial land. This is around 8 acres more than adjacent, centralized tracts despite being well below the average tract in the region (37 acres). Additionally, zoned unit capacity and market potential for housing (1,944 units) is more than double the average tract in the region (887 units). The same is true for existing density (FAR/acre).
- **Livability:** It takes 32 minutes to get to major job concentrations and major employers of the region by transit vs. 54 minutes for the average tract. The area is already much more walkable than most tracts in the region and a smaller share of households have access to a vehicle than the average tract.
- **Market Activity:** Area property values (\$5.4 million) and recent permit activity (923 housing units) are three times higher than the average tract (\$1.6 million, 327 permitted units).
- **Affordability:** There are a larger number of total rental units in the tract of the project area (1,200 units) relative to the average tract (740 units), but the share of households that are rent-burdened (53.81%) is higher than the average tract in the region (46.6%). For the limited number of homeowners, fewer are cost-burdened (7.34%) relative to the average tract (16.8%).