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Comments: CRC EIS

1) **Environmental Justice:**

P-043-001 Section 3.5.5. There is no discussion of the increased congestion on I-5, primarily southbound, though inner N and NE Portland. The Boise, Humboldt, Concordia and Kenton neighborhoods have high poverty and high minority populations. Increasing air pollution through increased gridlock in these neighborhoods should be addressed. Also, increased traffic on Greeley, Denver, Interstate, Vancouver/Williams and MLK should be addressed, as traffic will divert off I-5 from downtown to the Columbia River to avoid gridlock on I-5.

2) **Bicycle Mitigation during construction**

P-043-002 Page 3-61 should include facility improvements during construction to offset the degradation of the route during construction. This could include pavement improvements, wayfinding improvements, pavement widening, and other things to bring the current route up to ODOT and AASHTO standards during the construction process.

3) **Spillover traffic incorrectly counted as "leaving the I-5 corridor"**

P-043-003 Page 3-11 shows 35% of the I-5 bridge traffic leaving the project corridor on the Oregon side of the river. Anyone who has ever observed traffic backing up on N Interstate or N MLK knows that drivers use surface streets to avoid I-5 congestion through North Portland. This graphic should be corrected after data is collected pertaining to how much of the traffic that "leaves" is actually going to or from downtown Portland.

4) **No accounting of increased bicycle travel time with circuitous route**

P-043-004 Page 2-34 shows the bicycle route taking a 4-block long, 360 degree loop to get from the bridge deck to downtown Vancouver. This creates an unjust delay to bicycles relative to cars. They are forced to travel down to the riverbank in a big circle while cars travel directly through past downtown Vancouver. The bike route needs a second "exit" from the bridge facility to Fort Vancouver, at the "Community Connector" feature. This would shorten travel time from most points in Vancouver into Portland by 8 minutes over the current design.

Any civil engineer knows that routes should be designed to be direct. This "loop" will create a permanent penalty of time and energy for every bicycle trip across the river, compared to the equivalent car route. Bicycles should not be penalized for their mode choice with longer, hillier routes.

An analysis should be done comparing the bicycle route to the car route through the project area. The bicycle route should be comparable in terms of distance and topography.

5) **No giant parking garages**

P-043-005 Exhibit 2-2-19 shows three mammoth parking garages. At 400 spaces each, these will cost over a million dollars each to build. How about eliminating these garages, developing the land with mixed

P-043-001

Neither the CRC project nor the Delta Park projects are intended to address the southbound traffic congestion that currently exists near the I-5/I-405 split. However, traffic analyses show the congestion at the split will not be worsened because of the Columbia River Crossing project. The main reason is that fewer cars are expected to cross the river with a project in 2030 than without a project. This is due to the provision of improved transit service and tolling. Furthermore, because the Interstate will provide better mobility with the LPA, cut-through traffic on parallel neighborhood streets will be reduced.

P-043-002

In Section 3.1 of the FEIS, and in the Record of Decision, the project has identified a number of construction-period mitigations for bike facilities. As the project designs are advanced, these mitigations will also advance. The project and construction contractors will work with the community to provide suitable improvements and will refine these throughout the various stages of construction.

P-043-003

The data used in the analysis show that much of the exiting traffic has destinations within the subareas where the exits are. Many of these vehicles are, therefore, actually only using and only needing to use the Interstate for short trips. The Traffic Technical Report provides more details regarding these commute patterns. The project does recognize that many motorists exit the Interstate and use parallel routes in order to avoid the congestion on the Interstate. Many of these trips will return to the Interstate when congestion is relieved.

P-043-005 se TODs, and using the dollar saved to extant MAX to Clark College and through to the high-density neighborhoods along Fourth Plain and 18th Aves in Vancouver?

6) **Unrealistic assessment of northbound commute benefits**

P-043-006 Exhibits on page 3-153 shows a penalty to southbound Portland commuters for bridge construction. Traffic congestion (caused by Washington State Commuters) is simply shifted from downtown Vancouver to North Portland. But the northbound traffic shows no gridlock anywhere. This is suspect, as there is an equal amount of northbound traffic. It seems that it will be backed up in downtown Portland -- the delays will be on the Morrison Bridge and other I-5 on-ramps. These should be shown in the study.

7) **Bicycle Facilities in the proposal are not "World Class"**

P-043-007 Appendix F
Portland and Metro's endorsements (Portland Resolution No. 36618, July 9, 2008, and Metro's Resolution No. 08-3960B) both call for *World Class Bicycle Facilities* and for bicycle facility improvements *throughout the project area*.

Specifically, Portland calls for
IB 1. "The facility should meet or exceed standards set by "World-Class Facilities."

and Metro calls for
"The project should design "world class" bicycle facilities on the replacement bridge, bridge approaches, and throughout the bridge influence area that meet or exceed standards..."

The Bicycle and Pedestrian Committee did extensive research on their own time to identify what characterizes "World Class" facilities. They presented the material to the Project Sponsors Council, and their recommendations were systematically rejected. The main span is acceptable, but not world class. The approaches are poor, forcing bicycles to wander through all sorts of twists and turns, stopping and starting, and much out-of-direction travel. The facilities in the EIS are decidedly NOT "world class" when compared with the standards developed by PBAC.

Nor do they extend through the bridge influence area. There are no improvements south of Marine Drive in Portland or north of 7th St. in Vancouver. This is far short of the bridge influence area, and leaves bicyclists on outdated, dangerous, third-rate facilities in both Portland and Vancouver while they ride through the project influence area.

The CRC should follow these directives from Portland and Metro and upgrade the planned bicycle facilities.

P-043-004

The project has worked to shorten the bike pathways as much as possible while also keeping the grades (inclines) to a reasonable level and within established standards. Although the landing in Vancouver will require a loop ramp, the existing facility (west of I-5) currently relies on a long loop. The current east side loop, though smaller, requires sharp turns through a driveway and parking lot.

The idea of bringing a multi-use path all the way to the connector has been studied. A bike path from the River Crossing Bridge to the Community Connector will not be built due to geometric constraints through the SR 14 interchange. Standard vertical clearances under and over SR 14 ramps must be achieved and a 5% maximum path running grade is required for ADA compliance. A path through the SR 14 interchange would require excessively steep grades of 10-30%. Additionally, such a path would face complexities at the BNSF overcrossing, potentially enter into the Pearson Airspace and would impact Section 4(f)-protected properties to the east.

Also, the Reserve will be more accessible by bike since Apple Tree Park will be accessible from Main Street.

P-043-005

Decisions over the location and number of parking spaces provided at park and rides were designed to maximize ridership on light rail transit and are not expected to be eliminated. As described in the Indirect Effects Technical Report, transit-oriented development is predicted around transit stations and near the park and rides.

P-043-006

Although the specific reference could not be located, Mr. Buehler's point appears to be clear. The northbound commute will experience less congestion with the LPA, because the major bottleneck at the bridge will

be improved. In the southbound direction, however, there remains a congested bottleneck condition at the Rose Quarter. The LPA will reduce the number of cars entering the Rose Quarter from the north, but an improvement at that location will likely still be needed in the future, regardless of the CRC project outcomes.

P-043-007

As discussed in the DEIS and FEIS, a replacement bridge over the Columbia River will include dramatically improved bicycle and pedestrian facilities by providing:

- A new 16- to 20-foot multi-use pathway over the Columbia River completely separated from vehicle traffic due to the design of the Stacked Transit Highway Bridge;
- Protections from traffic noise, exhaust, and debris for pedestrians and bicyclists on the river crossing;
- More direct connections on each side of the river, consisting of stairs, ramps, and elevators, as well as pathway extensions that connect in with existing or planned facilities and public transit;
- Many new or enhanced sidewalks, bike lanes, and crosswalks near the bridge and throughout the project area.

Since the publication of the DEIS in May 2008, and the selection of the LPA in July 2008, the CRC project team has continued to work with the Pedestrian and Bicycle Advisory Committee and project partners to refine route and facility design. The updated design, as described in Chapter 2 (Section 2.2) of the FEIS, is the outcome of a long collaborative process.