

November 18, 2024

Interstate Bridge Replacement Program  
Attention: Draft SEIS Public Comment  
500 Broadway, Suite 200, Vancouver, WA 98660

Director Johnson and the IBR Project Team:

Thank you for the years of engagement with Oregon Environmental Council (OEC) and its partners around the wide variety of issues including active transportation, public transit, and the need to meet our greenhouse gas reduction goals. It is in this spirit of collaboration that we submit this comment letter for the DSEIS.

Oregon Environmental Council is a nonprofit, nonpartisan, membership-based, state-wide organization that advances innovative, collaborative and equitable solutions to Oregon's environmental challenges for today and future generations. Oregon Environmental Council has closely tracked the Interstate Bridge Replacement Program (IBRP) for years and we understand the potential long term impacts this project will have on transportation and land use patterns for the region for half a century to come. **With that in mind, we find the current IBRP, as proposed in the DSEIS, fails to meet the minimum standards for minimizing negative impacts, providing adequate alternatives, and effectively mitigating community harm.** The following include our main concerns

*Priority Concern #1: User Access and Experience for People Walking, Biking, Rolling*

It is critical that the new bridge meets or exceeds active transportation usership goals. For that to happen, the system must be designed to meet the needs of everyone, from eight to eighty years old, and regardless of their ability level. The current design does not meet this threshold, specifically: connectivity, level of stress/comfort, safety, and operations and maintenance.

- The elevation of the multi-use path crossing the Columbia River is of high concern. If the multi-use path cannot be lowered, then robust, well-maintained elevators need to be made available as a primary, reliable option for active transportation users. This challenge is especially made clear on the Vancouver access point. Under current design, active transportation users must descend (lose elevation) as they approach the waterfront, then

use a ½ mile long, 4.5% grade circular facility to climb up to the bridge before crossing the Columbia River. We are calling this the “Vancouver Dip.” This is a significant barrier and is ableist in design. The program needs to include a multi-use path at the bridge’s grade from Evergreen (the Vancouver library) to the riverfront so that walkers/rollers/riders have direct access to the bridge. This is an extreme example of out of direction travel that is exacerbated by out of elevation travel.

- There is additional out of direction travel for people making trips that combine transit and walking/rolling/biking. Current design places active transportation and transit facilities on opposite sides of the bridge, meaning users using more than one mode have additional out of direction travel getting from one side to the other. These additional distances are especially challenging for people with mobility challenges. If you are a multimodal commuter (walks, bikes, rolls AND uses transit in the same trip or commute) then the IBR project team really needs to hear how this would affect you. Share your stories of multimodal trips and how locating the multi-use trail and transit on the same side of the bridge is critical. By ensuring accessibility features, we protect the rights and needs of a broad user base, including non-drivers, low-income residents, and individuals with disabilities. Additional benefits of placing active transportation and transit on the same side of the bridge include:
  - a. Seamless Transition: Users should easily switch between transit and active transportation at any station, with no grade changes or distance barriers.
  - b. Shared Elevator Access: Allowing active transportation users to share transit station elevators eliminates the need for additional infrastructure, making the design more efficient and accessible.
  - c. Eyes on the Path: Transit operators and passengers provide a continuous presence, reducing the isolation felt on a multi-use path and enhancing safety and comfort.
  - d. Emergency Egress: The multi-use path should double as an emergency exit route for the transit way, supporting user safety during unexpected events.
  - e. Inclusive Design Principles: These principles ensure the accessibility and usability of both transit and active transportation facilities for individuals of all abilities.
- Walking/Biking/Rolling Connectivity to the Main Bridge Multi-use Path from Oregon Mainland The Interstate Bridge Replacement project must ensure complete and safe connections to the existing walking, biking, and rolling corridors in Oregon. These pathways need to be as physically separated from freight traffic as possible, especially in areas where new ramps and interchanges will be constructed. Maximizing this separation

is key to creating safer, more attractive, and therefore more heavily used walking, rolling, and biking routes.

- Separating Vulnerable Road Users from Freight is Critical - A distinct separation of walk/bike/roll corridors from freight routes reduces conflicts between these two user groups. For example, the current design for the ramp from Vancouver Way to MLK North poses significant conflict with freight, as the proposed route travels down, across, and back up a freight-heavy on-ramp. Given the Marine Drive interchange is usually described as the most heavily used freight corridor in Oregon, we believe additional alternatives need to be studied that entirely separate walk/bike/roll travel around rather than through this important freight interchange.
- Connection to the Interstate Avenue/Expo Way Walk/Bike/Roll Corridor The Supplemental Environmental Impact Statement (SEIS) presents a well-designed, safe separation for walk/bike/roll users along the Interstate Avenue/Expo Way corridor. This corridor provides an excellent example of the type of separation that should be extended to all Oregon walk/bike/roll corridors to ensure safety and connectivity.
- The Marine Drive Single Point Interchange The proposed design for the Marine Drive Single Point Interchange presents a potential conflict between bike lanes and freight traffic. We request that additional alternatives be studied, including options that completely remove bike lanes from this interchange and investment of saved funds into further enhancing other connections. These studies should also explore how the project can meet the requirements of the Oregon Bike Bill without relying on the shoulders of MLK and Marine Drive for bike travel. Our research suggests that the Oregon Bike Bill allows for more flexibility in design than the IBR project has acknowledged. We want to make sure that all allowable uses of the required 1% for bike/ped are studied with a focus on promoting vulnerable road user safety.
- The Vancouver/Williams Walk/Bike/Roll Corridor is a major north-south bike route in Portland, but its connection to the new main bridge multi-use path (MUP) is indirect and complicated. Northbound users must navigate bike lanes along the shoulders of northbound MLK, while southbound users must travel along a separated bike lane next to Union Court before joining southbound MLK on a shoulder bike lane. Additional alternatives should be explored in the SEIS to improve this connection. One potential solution is to extend the proposed Union Court separated bike lane further, creating a parallel cycle track or entirely separate path alongside MLK. This path could be located at the toe of the MLK embankment, providing a safe, barrier-separated corridor for both northbound and southbound travel. This would eliminate the need for bike lanes on the

shoulders of MLK, significantly separating pedestrian, bike, and roller traffic from freight movements.

These alternatives were previously proposed to the IBR project and have been studied by the City of Portland. We urge the SEIS to consider them further and to adopt separated facilities, especially in these most dangerous areas of heavy freight movement.

- The 40-Mile Loop East/West Corridor is the main trail hub for Portland and when fully completed will connect most of the other trails in the region together. Having excellent connections with the 40-Mile Loop is important for ease of use and wayfinding. The IBR is improving an important segment of the 40 Mile Loop and we like that! IBR's addition to the 40 Mile Loop Trail connects to the west to the already built separated trail along west bound Marine Drive. This connection is well-designed, offering a safe and direct route for cyclists and pedestrians separated from other traffic. We fully support this.
- However, the proposed eastbound connection to the Bridgeton Trail portion of the 40-Mile Loop is not ideal. The current design requires out-of-direction travel, routing users around a traffic circle to access the multi-use path on the west side of the Harbor Bridge. This is not a convenient or efficient connection. We request that alternative designs be considered to provide a direct connection from the Bridgeton Trail to the east-side sidewalk of the Harbor Bridge. This would encourage more users to cross the bridge as the east sidewalk offers a scenic view of North Portland Harbor and Mt. Hood. Additionally, we request that the sidewalk on the east side of the Harbor Bridge be as wide as possible and built with wide viewing areas to rest and enjoy the view.

*Priority Concern #2: Safety, Comfort and Equitable Multimodal Access*

The Interstate Bridge Replacement project must prioritize safety, accessibility, and comfort for all users, particularly those using active transportation modes. Our comments must emphasize the need to integrate active transportation and transit facilities closely, ensuring they serve as a cohesive and accessible network. Missteps in this design could lead to significant safety and accessibility issues, which NEPA requires us to address to protect the interests of all impacted populations. If a single-level bridge is chosen, the multi-use path should be positioned on the outer side, adjacent to the transit lanes. This placement would act as a buffer against noise, vibration, and vehicle debris from motor traffic, enhancing user comfort and safety.

- **Noise and Debris:** With tens of thousands of high speed car and truck vehicles passing over the bridge daily, active transportation users need protection from road noise and vehicle debris. To meet active transportation user goals, we need a design that protects users from these roadway hazards. Without adequate noise and debris shielding, the

bridge environment will be too uncomfortable and even hazardous. Such conditions could discourage walking, biking, and other modes, pushing people towards single-occupancy vehicle use, thereby increasing environmental impacts and reducing the project's alignment with climate resilience goals.

- **Temperature and Shading:** We know that ambient temperatures on/around the bridge will exceed 100°F in summer months. It is critical that active transportation users have natural and/or human-made shading to mitigate heat and weather impacts on users. Failure to do so could leave the bridge infrastructure unable to serve users effectively and, therefore, miss our active transportation user goals.
- **Unsheltered homelessness,** which is pervasive across Oregon, can be concentrated in the vicinity of covered projects. A safety and maintenance plan is essential to consider a compassionate, long-term approach that integrates both personal safety measures and supportive services for people experiencing homelessness. This way, the IBR can serve not just as an infrastructure project but also as a supportive space that balances public safety and social responsibility, while keeping our shared multi-use paths clear for use as transportation corridors.
- **Lighting and Isolation:** People will only use active transportation and transit if they feel safe. As such, lighting throughout the multi-use path project area is critical. Furthermore, placing active transportation and transit facilities together increases the number of people sharing the space and reduces the feelings of vulnerability and isolation, especially at night or during low-traffic periods.
- **Emergency Access:** We have concerns that medical and police vehicles cannot directly access the multi-use path. Additionally, lack of embedded rail ties prevents ambulances and emergency responders from directly getting to those using the transit system. Furthermore, if emergency responders are expected to access multi-use path and transit users by parking on highway shoulder and scaling a divider, we are concerned that this indicates there is not sufficient separation between automobiles traveling at highway speeds and active transportation modes (see “noise and debris” above).
- **Grade and Distance:** As mentioned previously, current designs require significant out of direction travel both in terms of distance and grade. It is worth noting that single occupancy vehicle travel experiences little to no out of direction travel while active transportation users in and out of Vancouver experience an additional one mile of out of direction travel each time they navigate the Vancouver Dip. This is an inequitable design.

*Priority Concern #3: Environmental and Climate Impacts*

Transportation contributes ~40 percent of Oregon's greenhouse gas emissions and the majority of those emissions come from single-occupancy vehicles. One of the cornerstone strategies OEC sees in reducing greenhouse gas emissions is through the reduction of vehicle miles traveled. By building excellent active transportation and transit facilities—and tolling appropriately—this infrastructure project could give world-class options to travelers that are healthier, more affordable and good for our environment.

- **Global impacts:** Unfortunately, the proposed design does little to reduce auto travel, estimating a 62% increase in study-area miles we drive (aka vehicle miles traveled or VMT) over current amounts (Executive Summary, S-21). Shifting modeshare to active transportation and transit is the most effective method of reducing VMT and meeting specific state/regional carbon reduction goals
- **Local impacts:** If this project fails to reduce VMT, local impacts include:
  - Additional air pollution (greenhouse gas and particulate matter) from internal combustion emissions generated by vehicles
  - Negative impacts to water quality from chemical, oil, tire particulate, and brake particulate runoff
  - Additional noise pollution to surrounding communities

*Priority Concern #4: Fiscal Responsibility and Economic Benefits*

Active and Public Transportation infrastructure can provide a very high return on investment if well designed.

- **Economies of Combined Systems:** By separating active transportation from light rail, the current project design expends dollars on separate access facilities to both systems. The most significant expenditure is on the spiral ramp connecting active transportation to the Vancouver waterfront and current design does not offer an elevator option to users of the multi-use path.
- **Demand Management:** Managing demand first, will help us shape a more efficient, right-sized, and thus cost-effective project for the future generations. Variable tolling is a powerful tool when equitably deployed.
- **Mode Equity:** Avoid subsidizing private auto travel at expense of walkers/rollers/cyclists
- **Long term funding plan for operations and maintenance (O&M) of active transportation facilities:** Variable Pricing (aka tolling) generates a revenue stream which can be used to fund operations and maintenance for the active transportation facilities,

including but not limited to clearing the right of way of debris, glass, trash, snow and ice, and generally keeping the routes/pathways on the bridge and approaches free of barriers.

- **Equity and tolling in the I-5 Corridor is not a matter of if, but when. For this reason, we insist that regardless which state manages the IBR toll program, that implementation is in accordance with [ODOT Equity and Mobility Advisory Committee's Low Income Toll Program](#)**, and so that the project enhances rather harms access and mobility for low-income and BIPOC communities.

The work to shape the future of Oregon and Washington through the Interstate Bridge Replacement Program is critical. At the root of this project, climate and equity benefits should be centered, and it must not perpetuate a status quo of steadily increasing driving and sprawl.

Our organization has a deep history in environmental policy advocacy. Oregon and Washington have both made big environmental policy steps over the decades, making bold decisions to break with the status quo when it no longer serves the present and threatens the health and stability of our communities in the future. In Oregon, we have a proud history of reimagining uses of federal transportation investments, for example with the Mt. Hood Freeway, choosing to invest in cutting edge light rail instead of expanding highways to the detriment of the region. Every one of those decisions was difficult, and it took courage and insight for the policy makers involved to imagine a different future. We are asking you to do that again with this project.

Thank you for your time and consideration.

Sincerely,



Kristopher Fortin Grijalva  
Transportation Program Director