

November 18th, 2024

To: Interstate Bridge Replacement

Re: NEPA Comment

Dear Interstate Bridge Replacement Team,

My name is Zachary Lauritzen and I am the executive director Oregon Walks. Founded in 1991, Oregon Walks is a pedestrian advocacy organization that advocates for safer, more accessible, and human-centered streets. We believe communities are healthier and our environmental outcomes are better when we make investments so that kids can walk to school and the park, where our older adults can age in place as they can no longer drive, where people with mobility challenges can still get around their community with dignity and access, and where everyone can meet their daily needs on foot. Please accept and record the following comments about the interstate bridge replacement environmental impact statement.

To meet our climate goals, it is critical that the new bridge exceeds non-vehicular travel goals. For that to happen, the project must be designed to meet the needs of everyone, from eight to eighty years old, regardless of their ability level, and for active transportation route design to prioritize non-car users. **The current design does not meet these thresholds.** The following comments outline various barriers embedded in the current design that prioritize walking and transit.

#### **Elevation and Out-of-Direction Travel**

The elevation of the multi-use path crossing the Columbia River is of significant concern. It is unreasonable to consider walking and rolling a project priority when accessing the path requires a ½ mile, 4.5% grade ramp on the Vancouver waterfront. This is a significant barrier and is ableist in design. If the multi-use path cannot be lowered, then robust, well-maintained elevators with an operations, maintenance, and funding plan must be in place.

The Vancouver Dip

The problems of out-of-direction and additional elevation loss/gain are most obvious on the Vancouver waterfront. Current design has the multi-use path ending at the waterfront rather than extending to Evergreen Boulevard. If the program is serious about significant increases in

walking and rolling through the project area, the multi-use path must extend at least to Evergreen Boulevard. It is impossible to argue that the project is equally prioritizing walkers, rollers, and bikers if they are not given a direct, at elevation route while vehicles have a straight shot. We ask the program to add a multi-use path—at the bridge's grade—from Evergreen Boulevard to the riverfront so that walkers/rollers/riders have direct access to the bridge that does not require out-of-direction and loss/gain of elevation.

Couple Transit and the Multi-Use Path Together

All transit users are pedestrians. As such, the current design—placing transit on one side of the bridge and the multi-use path on another—inherently embeds out-of-direction travel. With such a massive proposed structure—nearly 300' across—this is another barrier to meeting active transportation and transit goals which, in turn, will make it more unlikely that we meet our climate goals. Our experience as an organization—and research backs this up—shows that people who do not drive often combine multiple modes (walk, scooter, bike, transit, etc) of travel. As such, it is important that the multi-use path and transit are physically paired together for ease of transfer between the modes, thus reducing the friction for users.

This design change has a number of ancillary benefits that will improve the experience for active transportation and transit users:

- Shared Elevator Access: Pairing active transportation with the transit system allows multi-use path users to use the transit elevators, making the multi-use path more accessible without the need for additional elevators.
- Eyes on the Path: Transit operators and passengers provide a regular presence, reducing the isolation felt on a multi-use path and enhancing safety and comfort. Additionally, design principles of Crime Prevention Through Environmental Design (CPTED) would suggest that pairing transit and the multi-use path would increase safety by bringing more people/users into the space, creating safety in numbers.
- *Emergency Egress:* The multi-use path could double as an emergency exit route for the transit way, supporting user safety during unexpected events.
- *Inclusive Design Principles:* Pairing the multi-use path and transit increases the usability of both facilities, especially for individuals of varying mobility.
- Noise and Debris Reduction: Placing the transit way between the vehicle lanes and the
  multi-use path gives some buffer to the walkers, rollers, and bikers. Noise pollution is
  harmful and we should be doing everything we can to buffer walkers/rollers from the
  very significant noise of cars and trucks. Additionally, this space will reduce the amount
  of debris—tire tread, crash debris, etc—that is put onto the multi-use path.

## **Safety Measures**

It should go without saying: For people to use multi-use paths and transit, **they must both be safe and perceive themselves as safe**. Without safety, usership will plummet and we will not meet our non-vehicular travel goals. As such, we are asking for lighting through the multi-use path and transit areas, multi-use path separation from the freeway traffic by placing the transit way between the multi-use path and the roadway (see above), reducing isolation by pairing the multi-use path with transit, and building/planting natural and human-made shade.

## **Connecting Facilities**

## **Physical Separation**

Routes for people walking/rolling are only as strong as their weakest connection. Whenever possible, we ask that there is distinct, physical separation of walking/rolling corridors from freight and vehicular routes. This separation will reduce conflicts between these user groups, the burden of which is carried by the more vulnerable road user. For example, the current design for the ramp from Vancouver Way to MLK North poses significant conflict with freight because 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.

# Connections Into the Project Area

We recognize the interstate bridge program cannot complete every item on the regional wishlist that is remotely close to the project. That said, it serves us to remember that the public does not care what jurisdiction owns which connection into the project area. In fact, quite the opposite: they notice when connections between jurisdictions are unsafe, indirect, and uninviting. We know that we cannot meet transit and active transportation goals—and thus climate goals—unless the facilities connecting into the project area are world class. We ask that the project go above and beyond by investing in complete and safe connections to the existing walking, biking, and rolling corridors leading into the project area. These pathways need to be as physically separated from freight and vehicular traffic as possible, especially in areas where new ramps and interchanges will be constructed.

#### Lack of Health Analysis

The absence of the health analysis that was anticipated during this comment period is deeply disappointing and leaves us questioning the priorities of decision makers on this project. Ultimately it should be health—are we happier, healthier, living longer, etc—that should guide decisions. The public deserves to see—and have time to comment on—the health impacts of

**this massive investment.** Currently, those impacts are buried throughout thousands of pages of the environmental impact document, making them largely inaccessible to the general person. The highly focused health analysis would help the public access and explore some of the impacts of the project as currently designed. Our community deserves this opportunity.

Thank you for your consideration.

Sincerely,

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Zachary Lauritzen Executive Director Oregon Walks