

Earthquake Ready Burnside Bridge:
Combined Final Environmental Impact Statement/Record of Decision

Attachment A

Draft EIS Comments and Responses

For other questions including those related to the Americans with Disabilities Act and Civil Rights Title VI accommodations, call 503-988-5050. You can also call Oregon Relay Service 7-1-1 or email burnsidebridge@multco.us. For information about this project in other languages please call 503-988-5970.

Para obtener información sobre este proyecto en español, ruso u otros idiomas, llame al 503-988-5970 o envíe un correo electrónico a burnsidebridge@multco.us.

Для получения информации об этом проекте на испанском, русском или других языках, свяжитесь с нами по телефону 503-988-5970 или по электронной почте: burnsidebridge@multco.us.

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Comment ID	Topic	Comment By	Comment	Response	Response By
110479	Parks and Recreation	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	As the EQRB project moves forward into FEIS and design/engineering phases, please heed the following considerations: b-Coordination with Parks for maintenance and operations of Parks facilities, programming, and special events;	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Jennifer Hughes
110480	Utilities	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	As the EQRB project moves forward into FEIS and design/engineering phases, please heed the following considerations: c-Coordination with BES for access and maintenance to Ankeny Pump Station;	Added clarification in section 7.2 of the Utilities Technical Report that access to the Ankeny Pump Station will need to be maintained throughout construction. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Cory Burlingame
110481	Public Services	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	As the EQRB project moves forward into FEIS and design/engineering phases, please heed the following considerations: d-Coordination with PFR on emergency routes from Station #1;	The County will continue coordination with PFR in advance of, as well as during, the Final Design phase.	Sabrina Robinson
110483	Acquisitions and Relocations	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	As the EQRB project moves forward into FEIS and design/engineering phases, please heed the following considerations: e-Coordination with PBOT and private property owners about active construction sites, laydown and storage areas, and construction access locations where the access intersects onto City ROW;	Comment acknowledged. Coordination with PBOT and private property owners will be ongoing as we move into the construction phase of the project.	Patricia Thayer
110485	Land Use	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	As the EQRB project moves forward into FEIS and design/engineering phases, please heed the following considerations: f-Coordination with BDS and PBOT for permit inspections;	The County will continue coordination with BDS and PBOT in advance of, as well as during, the Final Design phase.	Sabrina Robinson
110487	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	As the EQRB project moves forward into FEIS and design/engineering phases, please heed the following considerations: g-Coordination with BES, Parks and BPS on impacts and mitigation to Greenways and natural features in the project area;	Addressed in FEIS Mitigation Section. Mitigations have been finalized, but the County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase."	Lewis Kelley
110490	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	As the EQRB project moves forward into FEIS and design/engineering phases, please heed the following considerations: and h-Coordination with PBOT ROW staff to identify and clearly establish roles of each agency for bridge/right-of-way responsibilities, including, but not limited to, sidewalk responsibilities, setting travel speeds, transportation facility striping, road closures, utilities, and notifications.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
109723	Comment noted	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	EPA agrees with the overall purpose and need of the proposed project to improve regional emergency systems by addressing the existing 94-year old Burnside Bridge seismic risks. EPA highlights the identification of planning criteria, significant issues, and alternative actions described in the DEIS considered inputs received from the public and EPA during the May 2020 project scoping period. Similarly, EPA recognizes the FHWA, ODOT, and Multnomah County for working with this project's Community Task Force and selecting the Preferred Alternative for implementation of the proposed project. The Alternative will build the new bridge in the same location as the existing Burnside bridge, which will reduce potential environmental impacts.	Comment acknowledged.	Shane Phelps
109724	Wetlands and Waters	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	Potential impacts to water quality and aquatic resources The project activities may impact water quality and aquatic resources, resulting in changes to water quality parameters (sedimentation and turbidity, and total suspended solids) in the affected Willamette River segment. EPA recommends the FEIS: • Discuss the project impacts analyses and conclusions based on the most recent WQS information. Where WQS are exceeded, it will be important for the EIS to discuss how impaired waterways would be restored;	Water quality impairments, TMDLs, and potential impacts are discussed in the Stormwater Technical Report, Wetlands and Waters Technical Report, and the Vegetation, Wildlife, and Aquatic Species Technical Report. A Biological Opinion was written for the project which discusses water quality standards that will be met by the project, including turbidity and other parameters, which are anticipated to be temporary and occur during construction.	Rachel Barksdale
109725	Wetlands and Waters	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	Potential impacts to water quality and aquatic resources The project activities may impact water quality and aquatic resources, resulting in changes to water quality parameters (sedimentation and turbidity, and total suspended solids) in the affected Willamette River segment. EPA recommends the FEIS: • Indicate how FHWA will work collaboratively with Oregon Department of Environmental Quality to ensure compliance with Water Quality Restoration Plans. These Plans function as FHWA's share of existing Total Maximum Daily Loads implementation in the analysis area, designed to meet federal and state water quality rules and regulations;	The project team has had ongoing coordination with DEQ throughout the project duration and has obtained a Section 401 Water Quality Certification that includes specific conditions to be met to ensure water quality is maintained. TMDLs are discussed in the Stormwater Technical Report.	Rachel Barksdale
109726	Wetlands and Waters	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	Potential impacts to water quality and aquatic resources The project activities may impact water quality and aquatic resources, resulting in changes to water quality parameters (sedimentation and turbidity, and total suspended solids) in the affected Willamette River segment. EPA recommends the FEIS: • Include the most current information regarding the status of the Clean Water Act Section 401 certification and Section 404 permit application processes, as well as conditions to protect water quality in the Willamette River;	The 401 Water Quality Certification was issued by Oregon DEQ on December 15, 2021. The Section 404 permit application is ongoing and the permit is anticipated to be issued in Q1 of 2023. Additionally, the NMFS issued a Biological Opinion for the project on July 13, 2021. The project will conform with the requirements of the Section 401 and 404 permits, as well as state and local permits that will be obtained during final design (e.g., DSL Removal/Fill and City of Portland permits). The project will also conform to federal, state and local water quality rules and regulations.	Rachel Barksdale

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109729	Wetlands and Waters	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Potential impacts to water quality and aquatic resources</p> <p>The project activities may impact water quality and aquatic resources, resulting in changes to water quality parameters (sedimentation and turbidity, and total suspended solids) in the affected Willamette River segment. EPA recommends the FEIS: • Consider utilizing low impact development techniques during the proposed project activities to reduce stormwater volumes and discharges. This will provide for mimicking the natural conditions as possible;2</p>	<p>The project will be designed following the City of Portland's stormwater design hierarchy which prioritizes bio infiltration and green stormwater techniques when possible. Mitigation measures addressing impacts to water quality and aquatic resources are detailed in the mitigation table of the FEIS/ROD.</p>	Cory Gieseke
109755	Wetlands and Waters	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Potential impacts to water quality and aquatic resources</p> <p>The project activities may impact water quality and aquatic resources, resulting in changes to water quality parameters (sedimentation and turbidity, and total suspended solids) in the affected Willamette River segment. EPA recommends the FEIS: • Include up-to-date information on the National Pollutant Discharge Elimination System permit application processes including measures to protect water quality and development of Storm Water Pollution Prevention Plans, reporting, and monitoring. The DEIS indicates that project construction would disturb an area of more than 1 acre of land, which would subject the project to NPDES permitting requirements for discharges to waters of the United States and accompanying Stormwater Pollution Prevention Plans, as well as best management practices, may be required;</p>	<p>NPDES permitting, water quality impacts, and BMPs are discussed in Section 3.14, Water Quality (3.14.4 specifically regarding mitigation). Mitigation measures for potential impacts to water quality and aquatic resources are included in the mitigation table of the FEIS/ROD.</p>	Rachel Barksdale
109756	Wetlands and Waters	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Potential impacts to water quality and aquatic resources</p> <p>The project activities may impact water quality and aquatic resources, resulting in changes to water quality parameters (sedimentation and turbidity, and total suspended solids) in the affected Willamette River segment. EPA recommends the FEIS: • Consider alternatives that will place the fewest number of structures in the Willamette River and bridge type options that will result in the smallest permanent structure footprint. For example, the proposed vertical lift or tied-arch bridges will result in the least potential for floodplain impacts and increasing scour;3 and</p>	<p>Addressed in SDEIS. The Preferred Alternative has the smallest permanent structure footprint within the Willamette River. See Section 3.17 Wetlands and Waters and Section 3.16 Vegetation, Wildlife, and Aquatic Species.</p>	Rachel Barksdale
109757	Wetlands and Waters	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Potential impacts to water quality and aquatic resources</p> <p>The project activities may impact water quality and aquatic resources, resulting in changes to water quality parameters (sedimentation and turbidity, and total suspended solids) in the affected Willamette River segment. EPA recommends the FEIS: • Describe plans to coordinate with ODEQ and all affected tribes to ensure that state and tribal water resources are protected from impacts associated with activities under the proposed action.</p>	<p>Ongoing coordination with DEQ, interested Tribes and NMFS has occurred since the beginning of the project. See the Wetlands & Waters Technical Report.</p>	Rachel Barksdale
109758	Wetlands and Waters	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>The DEIS indicates that water quality may be adversely affected if the new bridge construction activities (piers and bridge footings, surface pavement, earthwork and grading, excavations, floodplain scour, etc.) and decommissioning of the old one (pier removal, riverbed disturbance, existing bridge deck removal and dismantling, etc.) alter the hydrology. Water quality could be adversely affected as erosion carries sediment to surface waters and pollutants to local drainages and the underlying aquifer at, for example, staging areas. In addition, land disturbance, material storage, waste and wastewater disposal, inadvertent chemical or hazardous liquid spills, and compaction produced by vehicular traffic can all affect recharge to the local aquifer and groundwater quality. The project would also create in-water new structures (piers and bridge footings) and this could disturb and re-suspend contaminated sediment. EPA appreciates plans to design the project to protect floodplains and water quality following requirements under 23 CFR 650.</p>	<p>Comment acknowledged.</p>	Rachel Barksdale
109759	Hazardous Materials	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Hazardous materials and related impacts</p> <p>The proposed project has the potential to mobilize contaminants currently in soils and sediments, resulting in impacts to water quality within the Willamette River and to aquatic life and fish. The DEIS indicates that because of the proposed project, petroleum products may be accidentally spilled to the ground and contaminate soils and the Willamette River. This may particularly occur within actively used staging areas, as well as in-water and near-shore works. Paint, acids, solvents, asphalts, and other chemical pollutants may be used at construction sites and be spilled directly into the Willamette River or carried to the River via stormwater runoff. Removal of structures which contain contaminants such as lead, polychlorinated biphenyls (PCBs), and asbestos may also occur. Additionally, construction of river and stream crossings have the potential to stir up in-water sediments and riverbank soils contaminated with metals, PCBs, and polycyclic aromatic hydrocarbons, resulting in increased potential for impacts to water quality and aquatic life. Because of these potential impacts, EPA recommends the FHWA and partners: • Include in the FEIS detailed information of the specific measures to be taken to reduce impacts from possible release of hazardous materials into the environment and disturbance of contaminated sites;</p>	<p>Specific mitigation measures are included in the FEIS/ROD focused on addressing impact reduction related to possible releases of hazardous materials into the environment and disturbance of contaminated sites.</p>	Kelly Carini

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109760	Hazardous Materials	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Hazardous materials and related impacts</p> <p>The proposed project has the potential to mobilize contaminants currently in soils and sediments, resulting in impacts to water quality within the Willamette River and to aquatic life and fish. The DEIS indicates that because of the proposed project, petroleum products may be accidentally spilled to the ground and contaminate soils and the Willamette River. This may particularly occur within actively used staging areas, as well as in-water and near-shore works. Paint, acids, solvents, asphalts, and other chemical pollutants may be used at construction sites and be spilled directly into the Willamette River or carried to the River via stormwater runoff. Removal of structures which contain contaminants such as lead, polychlorinated biphenyls (PCBs), and asbestos may also occur. Additionally, construction of river and stream crossings have the potential to stir up in-water sediments and riverbank soils contaminated with metals, PCBs, and polycyclic aromatic hydrocarbons, resulting in increased potential for impacts to water quality and aquatic life. Because of these potential impacts, EPA recommends the FHWA and partners:</p> <ul style="list-style-type: none"> Identify mechanisms for monitoring for potential releases from these sources and steps that will be taken if release occurs. As an example, the FEIS could include information addressing Spill Prevention, Control, and Countermeasure plans for the project. 	The mitigation section of the FEIS/ROD identifies mechanisms for monitoring for, and addressing, releases of hazardous materials including SPCC plans, other related plans and mechanisms based on construction best management practices.	Kelly Carini
109761	Air Quality	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Potential impacts on air quality</p> <p>Regarding air quality impacts, EPA recommends the FWHA and partners:</p> <ul style="list-style-type: none"> Provide additional clarifying information in the FEIS on the DEIS statement that, "forecasting project-specific MSAT health impacts cannot be accomplished at this time." Prior to this statement, the DEIS discussed Mobile Source Air Toxics or MSAT concentrations and indicated these can be projected. It is unclear why related health impacts cannot also be determined. For information on National Air Toxics Assessment and resources including EJScreen, please consult EPA web site:5 	Clarification can be found in the resources linked to in the Air Quality Technical Report. Please see link https://www.fhwa.dot.gov/ENVIRONMENT/air_quality/air_toxics/policy_and_guidance/msat/ for additional details.	Scott Noel
109762	Air Quality	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Potential impacts on air quality</p> <p>Regarding air quality impacts, EPA recommends the FWHA and partners:</p> <ul style="list-style-type: none"> Indicate diesel construction equipment and vehicle use, such as approximate numbers and types of equipment and vehicles, duration of use and locations within the project site, staging areas, and expected routes for on-road vehicles in the FEIS. This data is particularly important in areas where construction is planned for 24/7 near vulnerable populations and facilities that provide shelter and resources for unhoused individuals. 	Information on construction routes, equipment, and other construction related details can be found in the Construction Approach Revised Technical Report for the Project.	Scott Noel
109763	Air Quality	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Potential impacts on air quality</p> <p>Regarding air quality impacts, EPA recommends the FWHA and partners:</p> <ul style="list-style-type: none"> Discuss air quality monitoring during construction with a focus on PM2.5 and Nox in the FEIS. EPA recommends that the monitoring take place during nighttime periods of strong inversion, when the planetary boundary layer is low. These events can prohibit the adequate dispersion of emissions, leading to high air pollutant concentrations near roadways and industrial sites. Perform monitoring within the autumn and winter months (September – February) to capture worse-case events. If emissions from diesel equipment are shown during these worse-case events to contribute to air pollutant concentrations well below the National Ambient Air Quality Standards, then monitoring can be discontinued. If monitoring demonstrates that emissions are causing concentrations close to the NAAQS, then EPA recommends additional mitigation be considered for the diesel equipment and that monitoring continue during such events; 	Agree with comment. This mitigation measure has been added.	Scott Noel

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109764	Air Quality	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabalile	<p>Potential impacts on air quality</p> <p>Regarding air quality impacts, EPA recommends the FWHA and partners:</p> <ul style="list-style-type: none"> • Provide information on coordination with other entities in the area, especially ODEQ and affected tribes, to ensure emissions due to the proposed project are reduced and mitigated. The City of Portland, for example, has a requirement in place for the tier of diesel engines that can be used on projects. Since appendix J mentions the clean diesel contracting rules, it will also be useful for this EIS document to indicate that local requirements on diesel equipment use will be met. <p>In addition to the above comments, EPA recommends the following updated information in the FEIS:</p> <ul style="list-style-type: none"> • Section 3.19.1: <ul style="list-style-type: none"> o The area was re-designated from nonattainment to attainment for CO in 1997 with an approved maintenance plan. The area has now completed the 20-year maintenance period; however, the air quality state implementation plan (SIP) is still in effect. • Section 3.19.2: <ul style="list-style-type: none"> o Under the No-Build Alternative, the proposed action is not implemented, and the area is anticipated to remain in attainment with all current NAAQS. Furthermore, with more stringent EPA regulations on vehicle engines and fuels having larger impact as the fleet turns over, future criteria pollutant emissions are expected to decrease compared to existing conditions. o In addition, the Project is not expected to change air quality because monitored CO... o ...and on-road vehicle travel to and from the site... 	Regarding clean diesel contracting rules, they are included as part of the regulatory requirements in the Air Quality Technical Report. The project will comply with the City's requirements as practicable.	Scott Noel
99986	Stormwater	(BES) Bureau of Environmental Services, Nishant Parulekar	3.7.2: For the BES bullet point: The two storm force mains from Ankeny go through the seawall to the Willamette. The storm pumps and storm force mains are critical to protecting downtown from flooding when river levels get too high. The storm mains should be avoided as much as possible.	Comment acknowledged. Minimization of impacts to, and avoidance of, critical infrastructure will be considered in Final Design.	Cory Gieseke
99987	Sustainability and Climate Change	Bureau of Planning and Sustainability, Mindy Brooks	Pg 8: Add City Title 24, which requires no-net-rise in flood elevation and balanced cut and fill to be met.	Addressed in SDEIS: Added City Title 24 to Relevant Policies/Regulations	Kelly Carini
99988	Sustainability and Climate Change	Bureau of Planning and Sustainability, Mindy Brooks	Pg 14: Add City of Portland Bureau of Development Services. BDS implements the zoning code Title 33 and Title 24.	Addressed in SDEIS: Added COP Bureau of Development Services to Relevant Policies/Regulations	Kelly Carini
99989	Sustainability and Climate Change	Bureau of Planning and Sustainability, Mindy Brooks	Pg 18: Add 1996 Flood Inundation Area (Metro Title 3) map to this list	Addressed in SDEIS: Added 1996 Flood Inundation Area (Metro Title 3) map to Relevant Policies/Regulations	Kelly Carini
99990	Land Use	Bureau of Planning and Sustainability, Mindy Brooks	Pg 5: While the technical report was written while CC2035 was not adopted, the rules of 33.440 will not apply to the project. Only 33.475 will apply. The rules related to the river are very, very different between the two codes. Please only address 33.475 for natural resource land use regulations.	Thank you for your comment. Addressed in FEIS - updated to indicate re-adoption of the Central City plan.	Sabrina Robinson
99991	Land Use	Bureau of Planning and Sustainability, Mindy Brooks	Pg 6: Add Central City Plan District (33.510) as well as Scenic Overlay Zone (33.480) as local zoning codes that need to be addressed.	Addressed in SDEIS: "Added Scenic Overlay zone, 33.480, to Relevant Regulations section in SDEIS Central City Plan District is already included in the Tech Report."	Sabrina Robinson
99992	Land Use	Bureau of Planning and Sustainability, Mindy Brooks	Pg 7: Add the City's Natural Resources Inventory and Central City Scenic Resources Inventory, both adopted with CC0235, as a sources of data for natural and scenic resources.	Addressed in SDEIS: Added sources to the affected environment list in SDEIS.	Sabrina Robinson
99993	Land Use	Bureau of Planning and Sustainability, Mindy Brooks	Pg 8: Add scenic overlay zone (s)	Addressed in SDEIS. FEIS includes scenic overlay.	Sabrina Robinson
99994	Land Use	Bureau of Planning and Sustainability, Mindy Brooks	Pg 9: Add scenic overlay zone (s)	Addressed in SDEIS. FEIS includes scenic overlay.	Sabrina Robinson
99995	Land Use	Bureau of Planning and Sustainability, Mindy Brooks	Pg 10: Add scenic overlay zone (s)	Addressed in SDEIS. FEIS includes scenic overlay.	Sabrina Robinson
99996	Economics	Portland Parks and Recreation, Tate White	Page 28: At what point are revenue impacts from displaced events going to be factored into this analysis (says pending on this page)? What is needed to ensure this is captured? Can it be captured fully at pre-design without full knowledge of construction impacts and resulting constraints on events?	Impacts to events, events-related expenditures, revenues to PP&R are acknowledged in DEIS Section 3.5.3. Mitigation measures are included in the FEIS/ROD mitigation table. Coordination will continue in final design for realizing and addressing revenue impacts.	Ewa Tomaszewska
99997	Economics	Portland Parks and Recreation, Tate White	Pages 61-62: Appreciate the inclusion of the following in mitigation section but can we also include language about coordinating with Portland Parks & Recreation on this work, including negotiating mitigation through the Non-Park Use Permitting process? "Consider construction approach/measures that could reduce the overall extent and duration of construction noise, street closures, park closures, and crossing closure"	The project will be coordinated with PP&R and specific schedules for the various construction activities will be established at the time when construction approach is finalized.	Ewa Tomaszewska
99998	Land Use	Bureau of Planning and Sustainability, Mindy Brooks	Pg 17: Add to the CC2035 description that new policies and implementing tools were adopted to better protect and conserve the Willamette River and it's riparian areas. Add that viewpoints and views were identified, including views of and from the Burnside bridges. Height regulations were updated to prevent intrusion into protected view corridors (aka viewsheds).	Addressed in DEIS errata and FEIS.	Sabrina Robinson

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99999	Section 4(f)	Portland Parks and Recreation, Tate White	Page M-2-10: The last paragraph in 2.4.5 talks about the long-span replacement alternative with no temporary bridge as being the alternative with the least harm to section 4f properties - but why wouldn't you also include with no ramp connection (in addition to specifying with no temporary bridge) given what is stated at the end of the previous paragraph?	Comment acknowledged. The SDEIS and FEIS Section 4(f) attachments include consideration of the ADA connection.	Jennifer Hughes
100000	NEPA Process	Portland Water Bureau, Mike Saling	Exec summary pg. 20: Mis-spelled "Guard".	Revised spelling in DEIS errata chapter.	Shane Phelps
100001	Section 4(f)	Portland Parks and Recreation, Tate White	Page M-2-11: Please reference Non-Park Use Permit policies in general and for park and trail closures - you can find them, including fees according to square footage and duration, at the following webpage: https://www.portland.gov/parks/non-park-use-permit-policies	Comment acknowledged, thank you. Non-Park Use Permit details will be addressed during final design.	Jennifer Hughes
100002	Land Use	Bureau of Planning and Sustainability, Mindy Brooks	Pg 22: This section does not address the consequences to the resources protected by the (e) or (s) overlay zones. Those resources are addressed in other Technical Reports, so perhaps just a cross-reference that the land use requirements of (e) and (s) are addressed in X and Y reports.	Addressed in DEIS Errata. Added reference.	Sabrina Robinson
100003	Section 4(f)	Portland Parks and Recreation, Tate White	I saw a comment about mitigation discussions being ongoing in the Executive Summary which is important to note. The full scale of 4f impacts will not be known until we have more design and construction details, meaning mitigation negotiations and decisions will take place far past the current FEIS scheduled completion.	Thank you. Comment acknowledged. There will be ongoing conversations about design details during final design.	Jennifer Hughes
100004	Vegetation, Wildlife and Aquatic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 7: Please clarify the document you are using is the Willamette River Central Reach Natural Resources Protection Plan, which includes an updated Natural Resources Inventory.	Changes to the technical reports written for the DEIS OR were not revised for the FEIS. Where applicable, sections of the DEIS chapters were revised based on comments received during the DEIS public comment period and are in the errata chapters of this FEIS.	Rachel Barksdale
100005	Sustainability and Climate Change	(BES) Bureau of Environmental Services, Nishant Parulekar	3.21.16: Unsure if the existing language of "extreme weather events" covers this but there will also be a higher frequency of extreme heat events (Fifth Oregon Climate Assessment)	Yes, higher frequency of extreme heat events is included within that extreme weather event term.	Kelly Carini
100006	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Timur Ender	Page J-3: potential mitigation measures for "increases in vehicle emissions during construction" section is extremely weak. Mitigation measures must include transportation demand management (TDM) programs and funding as well as funding for quick build projects that serve people during this construction. Funding could/should be provided for the following projects that could be delivered prior to bridge construction beginning: SW Alder transit priority (Burnside to Morrison bridge) \$1.3M project cost; SE Salmon (\$400K); NE Lloyd Blvd (\$1M); SW/NW 4th Ave (\$1.5M); SE Water Ave multimodal enhancement project (as alternative to esplanade) \$3.1M; SE Belmont/Morrison transit priority \$4M, and traffic signal reconstructions at SE Alder/2nd; SE Washington/3rd; SE 3rd/Alder (\$4.1M). Additionally, other mitigation could include NE Multnomah between NE 2nd- NE 16th (\$5M); NE Broadway (\$4.2M); SE Ankeny (\$400K); NE/SE 7th (\$5M). PBOT is unable to commit to firm timelines at this point but we could negotiate an acceptable mitigation plan related to funding and timelines for capital project delivery	Addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
100007	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-24: "For the temporary closure of the Burnside crossing that would last 4 to 5 years, potential detour routes from south of the bridge would likely divert travelers over the Morrison Bridge, adding about 1 mile and 8 minutes travel time for bicyclists and about 18 minutes for pedestrians. A possible alternative would be to route travelers over the Hawthorne Bridge that is located south of the Morrison Bridge." Given the poor connectivity to the Morrison Bridge (e.g., freeway ramps located at the bridgehead blocking direct access) and the much more bike/ped friendly nature of the Hawthorne, it should be assumed that a significant portion of bikes/peds will reroute upstream to the Hawthorne (esp. those travelling from the Buckman neighborhood). Please include this assumption in the detour routes in the FEIS.	Addressed in the FEIS Mitigation section. The detour routes have been updated and include an increased emphasis on the Hawthorne Bridge. The County commits to continuing coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
100008	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-24: "adding about 1 mile and 8 minutes travel time for bicyclists and about 18 minutes for pedestrians" This is a significant increase to ped travel time (as much as doubling).	Comment acknowledged. The County commits to continuing coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
100009	Vegetation, Wildlife and Aquatic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 7: Add LiDAR-derived vegetation. The Natural Resources Inventory does not include all vegetation, it only includes vegetation patch >1/2 acre in size. The LiDAR-derived vegetation data (GIS) includes all trees and low structure vegetation.	Individual trees have been included in the assessment. A tree inventory meeting City of Portland Title 11 requirements will be developed during final design.	Rachel Barksdale
100010	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Timur Ender	Page J-10: For "rerouting TriMet bus routes" ensure funding for PBOT to cover staff time and materials for enhanced curbside management.	Addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte

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100011	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-30: Please note that while not shown, many peds will choose to detour south to the Hawthorne Bridge rather than the Morrison. Those travel decisions will likely be made upstream of the detour point at the Burnside Bridge head (particularly those walking from the Buckman neighborhood). The Morrison Bridge suffers from connectivity issues (have to travel out of direction around freeway ramps to access it) and is less pedestrian/bicycle friendly than the Hawthorne. Once you veer south to Yamhill it is only a couple of short blocks remaining to access the Hawthorne.	Addressed in the FEIS Mitigation section. The detour routes have been updated and include an increased emphasis on the Hawthorne Bridge. The County commits to continuing coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
100012	Land Use	Bureau of Planning and Sustainability, Lora Lillard	The Mercy Corp parking lot is still under consideration for a ramp, though it is being shown as a Temporary Construction Easement. Please be transparent about this consideration as a potential ramp option for westside AT access as cited in the EQRB Active Transportation Access Options Memo.	Addressed in SDEIS: SDEIS does not propose a ramp here.	Sabrina Robinson
100013	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-31: Detour routes around MLK and Grand are NOT currently very ped friendly or comfortable. The project should install LPIs (at a minimum) or fully separated ped walk phases at all signalized intersections along this detour route to increase ped safety and comfort along these very busy streets, particularly as vehicle traffic will increase during construction.	Addressed in the FEIS Mitigation section. The detour routes have been updated and will include various improvements to address deficiencies along the route. The County commits to continuing coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
100014	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Timur Ender	Page J-14: "Construction traffic and activity can increase safety risks" - mitigation appears to suggest developing an action plan. Suggest requiring or incentivizing contractor vehicles to have truck guards that prevent pedestrians from getting caught in truck wheels. This item is part of PBOT's Vision Zero Action Plan	Addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
100015	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	Page 3-35 "These detours increase the pedestrian crossing risk (score increases from 15 to 40), mostly due to the 11 additional unsignalized minor road approaches that pedestrians are required to cross when using the Morrison Bridge route." This is a significant impact. The project will need to mitigate the increased risk to peds at intersection crossings along the detour routes. Mitigations should include at a minimum separating or partially separating ped crossing phases from vehicle turning phases (using LPIs and/or protected right/left turns), installing high visibility crosswalks where not already installed, evaluating lighting needs at pedestrian crossings along detour routes, etc.	Addressed in the FEIS Mitigation section. The detour routes have been updated and will include various improvements to address deficiencies along the route. The County commits to continuing coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
100016	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Timur Ender	Page J-14: "Closure of Eastbank Esplanade and Waterfront Trail disrupts physical activity" - proposed mitigation is weak and not commensurate to the level of impact caused. Propose project provide free BIKETOWN access for 4 years for marginalized individuals or other subset of population impacted by construction and its impediment to physical activity	Comment acknowledged. Addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
100017	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-36 "The intersection of W Burnside and NW 2nd Avenue may warrant changes to signal phasing to better separate bicyclists and pedestrians from right-turning vehicle traffic in the westbound direction. Such mitigation would be further developed in the final design phase." LPIs and/or ped/bike separation from vehicle turning movements should be provided for all legs/turning movements.	Addressed in the FEIS Mitigation section. The detour routes have been updated and will include various improvements to address deficiencies along the route. The County commits to continuing coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
100018	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Timur Ender	Page J-18: "Portions of Waterfront Park, Waterfront Trail and Eastside Esplanade will be unavailable for public access and recreation use for various durations." - proposed mitigation should include providing \$20M funding for capital projects to increase multimodal capacity of transportation system within 2 mi of Burnside bridge.	Comment acknowledged. Addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
100019	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Michelle Marx	pages 5 and 8: "Finally, although there is a signal, some concern has been raised about pedestrian safety within mid-block crossings." This statement is anecdotal and speculative, and is not data-backed. Please provide traffic safety data to substantiate this statement. I am not aware of any studies indicating that pedestrian hybrid beacons present safety concerns.	Comment acknowledged. Addressed in SDEIS Active Transportation Technical Report. Given the consistent and considerable feedback about mid-block crossings from multiple ADA advocates during multiple meetings, this text was deemed accurate and reasonable. As such, the statements within the memo have been preserved.	Steve Drahota
100020	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-36 "As the Project proceeds into final design, consider updating traffic signals within the Safety Direct API to include reflective backplates, protected only left turn phasing where left turn lanes already exist, and right turn and left turn traffic calming to reduce motor vehicle turning speeds and increase driver visibility of pedestrians and bicyclists." Please add LPIs to this list of signalized intersection improvements.	Addressed in the FEIS Mitigation section. The detour routes have been updated and will include various improvements to address deficiencies along the route. The County commits to continuing coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
100021	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 6: "This extended length could create conflicts between experienced bicyclists, recreational users, and pedestrians." It is unclear what about the length of a ramp would potentially create conflict between users.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes "Protecting-in-place" the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
100022	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Timur Ender	Page J-19: For Multiple impacts to parking and vehicular ingress/egress" - mitigation should include free BIKETOWN passes, free transit passes, scooter credits, and other "transportation wallet" options.	Addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte

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100023	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-37: To safety mitigations, add install LPs where fully protected right or left turns are not feasible; also add install high visibility crosswalks where not already installed along detour routes and evaluate lighting conditions at crossings on detour routes to verify that COP lighting levels are met at all crossings on detours.	Addressed in the FEIS Mitigation section. The detour routes have been updated and will include various improvements to address deficiencies along the route. The County commits to continuing coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
100024	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Michelle Marx	Section 2.3 Performance Assessment: In comparing scenarios it would be very helpful to understand impacts to pedestrian/bicycle delay associated with each scenario. Please add.	Addressed in SDEIS Transportation technical Report. Travel times for the switchback ramp and elevator options have been provided.	Steve Drahota
100025	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-37: To Active Transportation mitigations, add install traffic calming and/or diversion along Esplanade detour routes to better approximate off-roadway safety and comfort for recreational users.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified detour routes and mitigations on adjacent streets to mitigate changes to anticipated traffic patterns. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase	Lewis Kelley
100026	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Timur Ender	Page J-22: Proposed mitigation for "impacts to transit" transit prioritization at Bridgeheads. Need to ensure this comes with funding for PBOT staff time and infrastructure.	Addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
100027	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-38: "Mitigation for the No Temporary Bridge Option (in addition to those listed directly above)" Add to this list consider free transit passes or provide circulator shuttle to residents of the nearby neighborhoods who are more likely to be impacted pedestrians crossing the Burnside Bridge and who's walking trip is significantly impacted by the construction.	Addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City on this topic in advance of, as well as during, the Final Design phase.	Lewis Kelley
100028	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 28: This concept will require a PHB/midblock crossing across Naito	If this concept is advanced, a PHB/midblock crossing across Naito would be considered.	Steve Drahota
100029	Sustainability and Climate Change	Portland Water Bureau, Mike Saling	Removal of existing supports in Naito Parkway may impact water facilities.	In estimating the impacts to the water facilities due to the removal of the existing supports, it was assumed that the supports would be removed to just below the surface, and abandoned in place. This method reduces the impacts to the water and other facilities, and has already been accounted for. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Cory Burlingame
100030	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-193: Is the tree data current? If not, the figure should state the tree location data is based on a past inventory and may no longer be accurate.	Addressed in DEIS errata and SDEIS errata. See FEIS Section 3.16 for updated tree data.	Rachel Barksdale
100031	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-199: Including 'Trees Removed' in this table is not appropriate. Describe tall tree impacts, including trees removed, in permanent impacts.	N/A. The trees that will be removed will be replaced with 1.5" caliper trees. The functions/values of the trees in the project area are limited due to the urban setting and the need for regular maintenance. The tree removal is more accurately described as temporary.	Rachel Barksdale
100032	Parks and Recreation	(PBOT) Portland Bureau of Transportation, Timur Ender	Page J-30: Impacts to aquatic functions - project should consider building a permanent beach and replacing at least 1 public dock to compensate for extended impacts of construction on Esplanade and river access. This dock could be utilized as a ferry stop in the future.	Comment acknowledged. Decisions with regard to mitigation for City-issued permits will be determined during the Final Design and Permitting phases.	Jennifer Hughes
100033	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-200: Table describes permanent impacts to vegetation, etc. Tree removals should be included in the table 3.16-4 because they are permanent impacts. Elimination of planting locations also must be considered as permanent impacts.	The trees that will be removed will be replaced with 1.5" caliper trees. The functions/values of the trees in the project area are limited due to the urban setting and the need for regular maintenance. The tree removal is more accurately described as temporary.	Rachel Barksdale
100034	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-200: You describe option numbers in the following text. Show referenced option numbers in the table.	Addressed in SDEIS errata - see Table 3.16-1.	Rachel Barksdale
100035	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Timur Ender	Page J-39: "Traffic crash deaths in project area" propose including funding for capital projects that ensure safety and ADA accessibility near/approaching bridge as mitigation	Addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
100036	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	City of Portland Title 11 also requires a canopy density assessment. If density is not met after the project is completed, tree planting is required. This is a separate planting requirement from mitigation. Planting density for on-site trees is determined by the use of the impacted site and the species of retained trees. When rights of way are improved, street tree density requires trees every 25ft where existing infrastructure allows.	Comment acknowledged. Deferred to Final Design/Permitting Phase.	Rachel Barksdale
100037	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-202: Are trees removed based on current inventory? If not, heading should read "Estimated trees removed."	Addressed in DEIS errata and SDEIS errata. It was based on current inventory at the time of the DEIS and has since been updated.	Rachel Barksdale
100038	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Timur Ender	Any impacts to Better Naito should ensure there is an alternate high quality bike/scooter space. Rules for Waterfront park may need to be changed to temporarily allow scooter access during construction if Better Naito is impacted.	Addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley

Comment ID	Topic	Comment By	Comment	Response	Response By
100039	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-202: The blanket statement that tree replacement is 2:1 is not inaccurate. Tree replacement within the right of way (not adjacent to Parks properties) is maximized at 2:1 but depends on tree condition and species. Replacement for trees removed from private property and non-Parks property will be determined by Chapter 3.26 - Bureau of Parks, Title 11 Trees. Replacement for trees on Parks property and adjacent right of way is TBD.	Addressed in DEIS errata and deferred to Final Design: Mitigation ratio edited to say at least a 1:1 ratio. We will wait until the permitting phase to determine exact mitigation amounts required.	Rachel Barksdale
100040	Section 4(f)	Portland Parks and Recreation, Tate White	Bridge Type and connections selection will have significant impacts on 4(f) negotiations. Openness, including clear sight lines allowing for natural surveillance in Waterfront Park and along the Esplanade will be key. Having a bridge with less mass (i.e. thinner bridge deck, less columns) that meets the ground lightly and cleanly will improve the park and recreation experience.	Addressed in the SDEIS, which considered these issues with the Refined Long-span Alternative.	Jennifer Hughes
100041	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-202: Add statement: "The tree protection plan may identify and prescribe alternative construction methods and additional tree protection necessary for tree preservation."	Addressed in DEIS errata.	Rachel Barksdale
100042	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-201: City of Portland Title 11 also determines required tree planting for mitigation and density, and whether the tree protection plan is adequate for approval. City of Portland Urban Forestry, the Parks Division that administers Title 11, also has discretion to approve or deny tree removal.	Comment acknowledged. Title 11 is included in the table.	Rachel Barksdale
100043	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-202: Tree preservation off-site should be only considered to preserve historically important trees (e.g. flowering cherries located within the Japanese American Historical Plaza). Expert opinion is necessary to determine whether preservation off-site is feasible.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design and Permitting phases.	Rachel Barksdale
100044	Section 4(f)	Portland Parks and Recreation, Tate White	Page M-2-8 - 9: For the listed mitigation under Waterfront Park, can we talk about replacing any electrical equipment that is currently located in or near the existing bridge support columns and generally improving the user experience underneath the bridge, including but not limited to extending the Saturday Market area paving underneath the bridge? Generally, the section talks a lot about the Japanese American Historical Plaza which is great, but want to make sure we are also covering minimizing and mitigating harm underneath the bridge and any areas south of the bridge that are impacted. We don't want to see the vertical clearance from bridge deck to grade decrease from existing 23' and we need a 14' minimum vertical clearance provided by any additional structural components needed for the bridge. We also need a curb cut at Naito Pkwy that is a minimum of 30 feet long. We would like the turning radius for our largest vehicle (43.4 ft.) as well as for a tour coach bus to be accommodated under the bridge: https://www.dimensions.com/element/coach-buses#:~:text=Coach%20Buses%20have%20average%20lengths,these%20extended%20periods%20of%20travel.	Addressed in the SDEIS and FEIS Section 4(f) analysis. Refining details for electrical and utility layout under the bridge will happen during final design with coordination with the City. We have noted the concerns on clearance and attempted to address them with the refined girder design.	Jennifer Hughes
100045	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-193: Cherry trees within the Japanese American Historical Plaza should have different symbology from other trees.	The tree species are not differentiated by different symbology. No edit made.	Rachel Barksdale
100046	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-199: Summary of most tree impacts should be included in "Permanent Impact" section describing tree removal, root and branch pruning, approved encroachment into root protection zone by permanent infrastructure and other impacts identified by Project Arborist.	The trees that will be removed will be replaced with 1.5" caliper trees. The functions/values of the trees in the project area are limited due to the urban setting and the need for regular maintenance. The tree removal is more accurately described as temporary. (Other: Did not move to "permanent" impact since the trees would be replaced)	Rachel Barksdale
100047	Active Transportation Access Options	Portland Parks and Recreation, Tate White	Page M-1-37 - 38: There could be adverse permanent impacts to the Willamette Greenway Trail depending on the connection between Burnside Bridge and Eastbank Esplanade.	For the FEIS / ROD, the Preferred Alternative includes "Protecting-in-place" the existing City stairway. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahot
100048	Vegetation, Wildlife and Aquatic Resources	City of Portland - Urban Forestry, Brandon Namm	page 3-198: Temporary tree impacts should only describe approved encroachment into tree root protection zones for equipment staging/ access with approved tree protection measures.	The trees that will be removed will be replaced with 1.5" caliper trees. The functions/values of the trees in the project area are limited due to the urban setting and the need for regular maintenance. The tree removal is more accurately described as temporary. (Other: Did not make change)	Rachel Barksdale
100049	Section 4(f)	Portland Parks and Recreation, Tate White	Page M-1-25: Waterfront Park – Tree Removal North of Bridge (4 large and 20 smaller flowering ornamental trees) - I'm assuming these numbers will be decreased with construction modifications being discussed - correct?	Addressed in the SDEIS Chapter 3 Parks Section.	Jennifer Hughes
100050	Parks and Recreation	Portland Parks and Recreation, Tate White	It feels a bit weird to not address mitigation for tree loss in the Parks and Rec section when it is talking about tree removals. Can we add? There is mitigation through Title 11 but the about of removal and quality / uniqueness of trees removed may require additional 4(f) mitigation as has been done for other projects.	Addressed in the FEIS. The DEIS, and SDEIS (by incorporation of the original DEIS mitigation measures) refers to following the PP&R landscape design guidelines as well as Title 11. Language was added in Section 2.4.1 of the Section 4(f) attachment to the FEIS to specifically include coordination for tree replacement.	Jennifer Hughes
100051	Parks and Recreation	Portland Parks and Recreation, Tate White	An additional mitigation we'd like to explore more earnestly is a replacement structure for the Eastbank Esplanade during construction, especially in the context of the Active Transportation connections conversation which could lead to more extended closures.	Comment acknowledged. The floating esplanade would be temporarily removed to allow for intensive bridge construction activities. Due to construction activities, it is unlikely an alternate structure would be feasible.	Jennifer Hughes
100052	Parks and Recreation	Portland Parks and Recreation, Tate White	I guess I still disagree with saying the Meadow in Waterfront Park does not provide for any active recreation uses. It provides a large grassy area that people often use for pick-up / informal sports.	Comment acknowledged. We used this term because the Meadow is not developed for a specific sport.	Jennifer Hughes

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100053	Parks and Recreation	Portland Parks and Recreation, Tate White	In general, I worry about how much we are missing from potential permanent and temporary impacts from the active transportation connection options between the bridge and the Eastbank Esplanade, especially in terms of variations in construction timing amongst all the different options being explored with PBOT.	Addressed in the SDEIS. The active transportation connection options are included in the updated Section 4(f) analysis issued with the SDEIS.	Jennifer Hughes
100054	Parks and Recreation	Portland Parks and Recreation, Tate White	The locations where users will be detoured off of the Eastbank Esplanade go beyond the current API or APE for Parks and Rec and Section 4f. Shouldn't this full segment of the Eastbank Esplanade that will be rendered unusable temporarily be included?	Our detour routing for bike and pedestrians was not meant to capture all possible detour routes someone trying to avoid construction could potentially take or to provide the only route someone can take. Rather, the detour routes provide an assessment of reasonable detour paths to get from one bridgehead to another. We expect users to use the route most convenient to them. To that end, the routes that users will actually take to detour around construction are numerous. Additionally, the project is not altering any infrastructure to 'create' these detour routes. Because of this, it is not necessary or feasible to include that area in the API or assess impacts.	Jennifer Hughes
100055	Parks and Recreation	Portland Parks and Recreation, Tate White	By Ankeny Plaza structure are you referring to the Saturday Market structure? Curious as to why you are calling it this as it's across the street from Ankeny Plaza. I'm sorry I did not comment on this earlier in the process. Would be more appropriate to call it the Waterfront Park Pavilion.	The term Ankeny Plaza Structure is used for the structure in Waterfront Park that is used by the Portland Saturday Market. Because many other reports and all figures on which it appears use the term Ankeny Plaza Structure, the Project elects not to change the name at this point. We have revised the text in the FEIS Chapter 3 Errata Table of Changes to SDEIS to indicate the structure can also be referred to as the Waterfront Park Pavilion.	Jennifer Hughes
100056	Parks and Recreation	Portland Parks and Recreation, Tate White	parks and rec page 39: This page mentions other commercial boats providing recreation opportunities not being able to dock along the seawall at Waterfront Park. We need to adequately consider and address these impacts. Either here or in the Economics chapter. PP&R receives revenue from docking fees for example: Un-Cruise Cruise Lines (\$14,000), American Empress (\$13,300), Lindblad Expeditions (\$12,900).	Comment acknowledged. Issues related to docking fees will be included in the Non-Park Use Permits discussions during final design.	Jennifer Hughes
100057	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Timur Ender	Pg 23: Having a signal on the Burnside Bridge would likely make it more convenient to access bridge from esplanade. This should happen even if Esplanade bridge access is served from both sides. AT minimum, there should be a direct (non weaving) ADA accessible path from Burnside bridge to esplanade on south side given the significant distance between bridge and esplanade	Addressed within the SDEIS	Steve Drahota
100058	Parks and Recreation	Portland Parks and Recreation, Tate White	Saying that there are not permanent adverse effects is now questionable given the active transportation connection options being discussed. Some of these could have adverse impacts on the Eastbank Esplanade.	The SDEIS Refined Long-span Alternative eliminates the option for ramp access to the Eastbank Esplanade and includes an option for elevators and stairs or reconnecting the existing stairs. Thus potential adverse permanent effects from the ramp options are not discussed further.	Jennifer Hughes
100059	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Timur Ender	pg. 28: There should be some sort of convenient bridge access from Better Naito/Waterfront Park to Eastbound bikeway on bridge as well as westbound bridge to Better Naito that doesn't involve going all the way to 2nd.	Comment acknowledged. Multiple access point options from the Waterfront Park to the bridge were considered but dismissed during the DEIS process based on feedback from Portland Parks.	Lewis Kelley
99973	Air Quality	City of Portland, Christine Kendrick	Pg 23: A note of appreciation for the discussion about air toxics concerns and state of the science on understanding exposure and research of health risks from projects. Also appreciate the discussion of limitations and uncertainty in modeling steps.	Comment acknowledged.	Scott Noel
99974	Air Quality	City of Portland, Christine Kendrick	Pg 28: Could be helpful if authors provide an example of an activity that could be taken by residents and occupants of buildings in construction zone to reduce potential construction dues and emissions.	Comment acknowledged, however these are the standard abatement measures ODOT implements on projects. No change.	Scott Noel
99975	Land Use	Bureau of Planning and Sustainability, Lora Lillard	Pg 6: The Recommended Draft for Design Overlay Zone Amendments is going to Portland City Council on 5/12/21. Changes to 33.825.065 are included, which may affect how bridges are reviewed in d-overlay zones (recommendation is that they be processed through a Type III Land Use Review). Recommended Draft is available at www.portlandoregon.gov/Bureau of Planning and Sustainability/doza/recommended-draft - see Volume 2 for Code Amendments to that chapter.	Addressed in SDEIS: Added to SDEIS Relevant Regulations section: "Updates to Design Review Standards applying to bridges adopted 8/1/21, including 33.420.041 (c); 33.420.045 (a)(9)"	Sabrina Robinson
99976	Parks and Recreation	Bureau of Planning and Sustainability, Lora Lillard	Consider detour on 6th Ave to Davis/ future Green Loop - more direct and flat. CEIC and Friends of Green Loop plan street activations and mural paintings on major intersections along 6th Avenue.	Our detour routing for bike and pedestrians was not meant to capture all possible detour routes someone trying to avoid construction could potentially take or to provide the only route someone can take. Rather, the detour routes provide an assessment of reasonable detour paths to get from one bridgehead to another. We expect users to use the route most convenient to them. To that end, the routes that users will actually take to detour around construction are numerous. Additionally, the project is not altering any infrastructure to 'create' these detour routes. This recommendation can be evaluated during final design and construction planning.	Jennifer Hughes
99977	Parks and Recreation	Bureau of Planning and Sustainability, Lora Lillard	Is there a reason pedestrians are being routed to MLK on one map and Grand on another? The street conditions are quite different for pedestrians and are arguably better on Grand Ave (historic main street) or 6th Avenue (historic nodes and future Green Loop). CEIC and Friends of Green Loop plan street activations and mural paintings on major intersections along 6th Avenue.	Addressed in the FEIS in the Supplemental Analysis and Discussion Section, as the proposed detour routes no longer include Martin Luther King Jr. Boulevard or Grand Avenue. Finalizing detour routes will occur during construction planning.	Jennifer Hughes

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99978	Environmental Justice and Equity	Bureau of Planning and Sustainability, Lora Lillard	Pg 6: Vulnerable Communities - see how City of Portland defines vulnerable populations using four factors: communities of color, education attainment, income, renter vs. owner. https://www.portland.gov/bps/adap/gentrification-and-displacement-studies . See first PDF link for definition and this recent series of maps: https://www.portland.gov/sites/default/files/2020-01/gentrification-displacement-maps.pdf	Thank you for your comment. Environmental justice populations are addressed in the Draft and Final EIS. Additional discussion related to the communities you've highlighted are also provided in the EQRB Equity Report to further explain the relationship between Environmental Justice Populations and broader equity populations and vulnerable communities. The County commits to continuing coordination with the City in advance of, as well as during, the Final Design phase to ensure vulnerable communities are being properly accounted for as the project moves forward.	Eduardo Montejo
99979	Social and Neighborhood Resources	Bureau of Planning and Sustainability, Lora Lillard	Pg 11: Oregon Nikkei Legacy Center renamed to Japanese American Museum of Oregon in 2020: http://www.oregonnikkei.org/ (this has been acknowledged on p. 21 also)	Addressed in DEIS Errata and FEIS; Thank you.	Sabrina Robinson
99980	Active Transportation Access Options	Bureau of Planning and Sustainability, Lora Lillard	Pg 39: The Mercy Corp parking lot is still under consideration for a ramp, though it is being shown as a Temporary Construction Easement. Please be transparent about this consideration as a potential ramp option for westside AT access as cited in the EQRB Active Transportation Access Options Memo.	Comment acknowledged. The FEIS does not propose a ramp in this location.	Steve Drahota
99981	Sustainability and Climate Change	Bureau of Planning and Sustainability, Jeff Caudill	Pg 6: Statewide Planning Goal 7, Areas Subject to Natural Hazards, should probably be identified in the state mandates.	Addressed in SDEIS; Added to Relevant Policies/Regulations	Kelly Carini
99982	Sustainability and Climate Change	Bureau of Planning and Sustainability, Jeff Caudill	Pg 8: Seems like climate change-related Comp Plan policies should also be identified.	Addressed in SDEIS; Added to Relevant Policies/Regulations	Kelly Carini
99983	Sustainability and Climate Change	Bureau of Planning and Sustainability, Jeff Caudill	Pg 11: Seems like City Title 24 requirements (cut/fill) should be added to this list.	Addressed in SDEIS; Added to Relevant Policies/Regulations	Kelly Carini
99984	Sustainability and Climate Change	Bureau of Planning and Sustainability, Mindy Brooks	Pg 12: Add the 1996 Flood Inundation Area (Metro Title 3) to the map. City Title 24 applies to both the 100-year floodplain and the 1996 Flood Inundation Area.	Addressed in SDEIS; Added to Relevant Policies/Regulations	Kelly Carini
99985	Sustainability and Climate Change	Bureau of Planning and Sustainability, Mindy Brooks	Pg 13: Add 1996 Flood Inundation Area (Metro Title 3) to the list of data	Addressed in SDEIS; Added to Relevant Policies/Regulations	Kelly Carini
99954	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Burnside/MLK Still goes from LOS F existing year to LOS C future year. As noted in the Tech Report comments, this doesn't not seem realistic. Ryan LeProwse and I discussed the reasons for this and had a plan to address in the analysis.	As part of the Transportation Supplemental Memorandum included with the SDEIS, the refinements to the traffic analysis projections were made.	Emily Welter
99955	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Tables and text should report the difference in travel time for the optimal route in each group. For a route for which the optimal (fastest) route was previously the Burnside Bridge, what is the optimal time, and how much longer is it?	Comment acknowledged. Changes to the technical reports written for the DEIS were not revised as part of the FEIS. Where applicable, sections of the DEIS chapters were revised based on comments received during the DEIS public comment period or are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of FEIS errata. Tables have been updated to highlight the optimal route under each modeled scenario.	Lewis Kelley
99956	Vegetation, Wildlife and Aquatic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Page 8: Not only are there stands of woodlands (>1/2 acre patch of trees) there are also individual trees or smaller standards of trees (<1/2 acre)	Comment acknowledged. Individual trees are counted in addition to the vegetation. See Section 3.16 for figures of existing trees and vegetation.	Rachel Barksdale
99957	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Reference to left turn phasing and left turn lanes should be just turn phasing and turn lanes, as it could apply to right turns as well.	Comment acknowledged. Changes to the technical reports written for the DEIS were not revised as part of the FEIS. Where applicable, sections of the DEIS chapters were revised based on comments received during the DEIS public comment period or are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of FEIS errata.	Adrian Witte
99958	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Mitigation for safety should change protected left-turn lane to include right turn lanes	Because the temporary impacts of construction are essentially the same for the Refined Long-span as for the DEIS Long-span, they are not discussed in the SDEIS.	Adrian Witte
99959	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Suggest identifying a process for workshops to discuss construction mitigation specifics by mode. Potential mitigations could include - Safety: mitigation of turns for detours. Peds: routing, crosswalk improvements, signal protection. Bikes: routing, intersection treatments, signal timing/protection. Transit: priority treatments, stop relocations if needed, signal timing. Traffic: detour routes, signal timing/phasing.	Addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
				Comment Acknowledged. Mitigations have been identified, including detour routes and improvements along identified detour routes, and are addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley

Comment ID	Topic	Comment By	Comment	Response	Response By
99960	Vegetation, Wildlife and Aquatic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Page 8: Please clarify the definition and explanation of riparian area. The riparian area is land within 100 feet of the river, regardless of condition, vegetation or development. The riparian area is the area surrounding the river that has a direct impact (negative or positive) on the quality and functionality of the river. "The riparian area is limited to the park vegetation" is an incorrect explanation of riparian area. Correct is - "The riparian area is significantly impacted. Within the riparian area there is a seawall, riprap, roads, buildings and parks. Vegetation in the riparian area is limited to the park, including cultivated herbaceous vegetation, small woodlands and individual trees."	Changes to the technical reports written for the DEIS were not revised for the FEIS. Where applicable, sections of the DEIS chapters were revised based on comments received during the DEIS public comment period and are in the errata chapters of this FEIS. For this comment, no change was made to the DEIS text because the comment did not impact the DEIS analysis.	Rachel Barksdale
99961	Air Quality	City of Portland, Christine Kendrick	Pg 9: PM2.5 and PM 10 data in Table 2 are flagged as forest fire data included. However the Oregon 2018 Air Quality Annual Report does not share 2016 data with forest fire data included for 2016 for either measure of PM2.5 and PM10. The footnote of b should only be applied to 2017 and 2018 columns.	Comment acknowledged. However, no change because the bullet is not necessarily applicable to all years, which is why it's associated with the pollutant column not the year columns.	Scott Noel
99962	Air Quality	City of Portland, Christine Kendrick	Pg 9: The data reported for 2016, 2017, 2018 ozone 8 hour 98th percentile does not appear to match up with Oregon 2018 Air Quality Annual Report. The 4th highest 8-hour averages in that report for 2016, 2017, and 2018 are 0.055, 0.068, and 0.067 ppm. The authors have reported the 3 year average values in Table 2 (0.055, 0.060, 0.063 ppb) so either the description of the unit in the column and the footnotes needs to be corrected or the values changed. Since there is a 3 year average column, the authors should just add the 2018 3 year average value there and report the more specific 98th percentiles values in the 2016, 2017, and 2018 columns.	Comment acknowledged. No Change. ODOT AQ staff requested that the values be reported in this manner.	Scott Noel
99963	Vegetation, Wildlife and Aquatic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Page 37: The statement "the permanent impacts of the Retrofit are minor when considering the amount of existing shallow water habitat ..." does not take into account the fact that the river should be 80% shallow water habitat. Over time, we have removed nearly all shallow water habitat leaving behind these small, disconnected remnant areas and those areas have become critical to survival of species that are now threatened and endangered. Any additional permanent loss of shallow water habitat is significant, not minor. Per 33.475, the impacts to the features and functions of the shallow water habitat must be fully mitigated at 1.5:1 (mitigation to impact area) ratio for on-site, additional mitigation will be required if it occurs off-site.	Addressed in DEIS errata. Revised statement to remove that impacts are minor.	Rachel Barksdale
99964	Air Quality	City of Portland, Christine Kendrick	Pg 9: The 3-year average should indicate which year the corresponding values is reported for. So the column should say 2018 y-Year average to indicate which three years are in that value.	Comment acknowledged. No Change. ODOT requested that the data be presented in this manner.	Scott Noel
99965	Vegetation, Wildlife and Aquatic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Page 69: Remove Title 33- Greenway Review. The Greenway review no long applies in the Central City. Instead the River Review applies.	Addressed in DEIS errata.	Rachel Barksdale
99966	Air Quality	City of Portland, Christine Kendrick	Pg 9: The SO2 3 hour standard of 0.5 is in ppm. Values are reported correctly, just need to change unit from ppb to ppm.	Addressed in SDEIS; Changed.	Scott Noel
99967	Air Quality	City of Portland, Christine Kendrick	Pg 9: Text after Table 2 refers to a resource (DEQ 2016) but I don't see a reference in Section 11 that matches this. Authors should review the OR DEQ 2018 Oregon Air Toxics Monitoring Summary https://www.oregon.gov/deq/air/Documents/2018AirToxicsSum.pdf . This report has found air toxics (arsenic and some related to traffic like ethylbenzene) are above ambient benchmark concentrations at all monitoring locations including Portland sites. Not all trends are decreasing downward. The authors should revise this section after reviewing the 2018 air toxics monitoring report from OR DEQ.	Addressed in SDEIS; revised the paragraph in question and provided it in the tech memo. The trend downward is for roadway traffic generated air toxics.	Scott Noel
99968	Air Quality	City of Portland, Christine Kendrick	Pg 10: Why not show data for Acetylaldehyde and ethylbenzene since these are specifically identified in the MSATS NEPA review recommendations?	Comment acknowledged. No change. These charts are what are typically included in ODOT AQ tech analysis for FHWA funded projects.	Scott Noel
99969	Air Quality	City of Portland, Christine Kendrick	Pg 14: Bar charts for intersections for the information in Tables 3-6 would better help convey what the authors want the readers to do. Asking the reader to compare values across four different tables is not effective at understanding the differences or lack of differences in traffic between existing and alternatives. Tables could remain as supporting detailed information.	Comment acknowledged. No change, these tables were vetted through ODOT and the County. The tables are a standard format that these agencies use. Changing, removing, or replacing charts is not recommended.	Scott Noel
99970	Vegetation, Wildlife and Aquatic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Page 71: Add City of Portland Bureau of Development Services. BDS implements Title 33	Not applicable; This section is meant for specific people/agencies who were contacted during the initial drafting of the Vegetation, Wildlife, and Aquatic Species Technical Report.	Rachel Barksdale
99971	Air Quality	City of Portland, Christine Kendrick	Pg 18: Section 7.3.1- NOX and PM2.5 are also important emissions from heavy duty diesel equipment, why not referenced here? If this is limitation of ODOT of FHWA methods which focus on CO and PM10 only that could still be mentioned.	Comment acknowledged. No change. The reviewer is correct, this is anticipated to be a federally funded project and as such these are the emissions of concern.	Scott Noel
99972	Air Quality	City of Portland, Christine Kendrick	Pg 21: In fourth paragraph, it appears a word is missing. Need to add "despite the rise in VMT..." rather than saying both the reduction in annual emission rates and the increase in VMT will both reduce the background level of MSAT in this project.	Addressed in SDEIS; Comment addressed in SDEIS memo.	Scott Noel

Comment ID	Topic	Comment By	Comment	Response	Response By
99925	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Transportation 3-13: RE Option 2 - A major issue with the elevator is reliability for those who need it most. For people who walk, they can use the stairs when the elevator is down. For bicyclists, although inconvenienced, they can try the stairs and bike gutter or ride to another access point. But for people who actually need the assistance to travel vertically, they are majorly inconvenienced when the elevator is out of operation. They have no alternatives except for a long trip to the next ADA access point. A ramp very rarely closes and is more reliable. Please provide more explanation of potential elevator closures and an analysis of elevator closure impacts to different user groups.	Additional information was provided in the SDEIS.	Steve Drahota
99926	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, April Bertelsen	Transportation- Chp 5 page 29: Last bullet about Streetcar Loop and BAT lanes on MLK/Grand. Correction to installation timeline: They were installed in Fall 2020. Project is completed. They benefit both Streetcar and bus line 6. https://www.portland.gov/transportation/pbot-projects/ccim/construction/mlk-grand-transit-lane-improvements	Comment acknowledged.	Adrian Witte
99927	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, April Bertelsen	Transportation- Chp 8 page 7: Delete this bullet: "The potential closure of the Steel Bridge to all but buses and LRT during Burnside Bridge construction was suggested by some stakeholders as a measure to consider for mitigating the impacts of the Full Closure option on transit travel times and transit ridership. However, the anticipated impacts of the Full Closure option on transit ridership are small, whereas closing the Steel Bridge to traffic for 3.5 to 4.5 years at the same time that the Burnside Bridge is also closed, has the potential to cause significant impacts to traffic and freight congestion and travel times, as well as increase GHG and other emissions due to the increased congestion." I thought we agreed it would be replaced by the "consider..." bullet above on page 8-6.	Comment acknowledged. A decision has been made to maintain the bullet as is. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase	Lewis Kelley
99928	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, April Bertelsen	Transportation- Chp 8 page 9: Repeat this mitigation bullet (on page 8-6) again here in the Full Closure mitigation recommended actions: "Consider temporary closure of the Steel Bridge to all vehicles except buses and LRT during Burnside Bridge construction. This was suggested by some stakeholders as a potential measure for reducing the impacts of the No Temporary Bridge option on transit travel times and ridership. This mitigation would need further outreach and analysis as closing the Steel Bridge to non-transit vehicles has the potential to cause significant impacts to vehicular traffic and freight by lengthening their travel times to other bridges and increasing congestion for all on both sides of the river. 17 Travel impacts due to full closure of the Burnside Bridge could be exacerbated by construction of other regional transportation projects, such as the I-5 Rose Quarter project, anticipated to take place in the same timeframe as EQRB construction. Although the potential for cumulative temporary traffic impacts has been analyzed for the Draft EIS, the construction timing and assumptions of these projects are likely to evolve as they advance through project development. It will be important to monitor and evaluate those changes so as to understand and address any changes in the potential for concurrent impacts to all travel modes."	Comment Acknowledged. Mitigations have been identified, including detour routes and improvements along identified detour routes, and are addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99929	Floodplain and River Hydraulics	BDS Site Development, Jason Butler-Brown	Permanent Encroachments Per Section 24.50.060.D of the Portland City Code a technical "no-rise" analysis must be provided that demonstrates the development will not result in a rise in the FEMA base flood elevation. The narrative identifies that the proposed bridge alternative and associated improvements is expected to result in a nominal rise in the FEMA base flood elevation. Please refer to the attached FEMA Region X – Procedures for No-Rise Certification for reference. The narrative correctly identifies that a variance to 24.50.060.D will be required and that under 44 CFR 60.3(d)(4) a Conditional Letter of Map Revision (CLOMR) is required to revise the Special Flood Hazard Area and floodway. The design team may wish to revise the narrative to acknowledge that an ordinance must be approved by Portland City Council to authorize the project team to apply to FEMA for the CLOMR and the subsequent Letter of Map Revision (LOMR) once construction is complete. An alternatives analysis must be submitted with the CLOMR application per 44 CFR 65.12 that demonstrates why alternatives to the preferred design which result in a lower rise in the base flood elevation are not feasible.	Comment acknowledged, addressed in DEIS. The potential impact and possibility of a variance request is discussed in DEIS to the level of detail appropriate for NEPA review. The County commits to continuing close coordination with the City regarding flood permitting in advance of, as well as during, the Final Design phase. Julie garnet	

Comment ID	Topic	Comment By	Comment	Response	Response By
99930	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 1: Introduction: "These options are to provide..." Are these really "options"? Are they required by the City? The way this is written it sounds like it's not a requirement but only "additional and more direct".	Comment acknowledged. As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on both the west and east sides of the Willamette River. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99931	Social and Neighborhood Resources	Bureau of Planning and Sustainability, Rachael Hoy	page 51-52 and general: when the report talks about construction impacts there is often conversation about short term impacts to social cohesion and neighborhood quality of life. I think that there will be long term impacts for some of the more vulnerable businesses and communities during construction- this disrupts social cohesion. We may see more permanent closures. I don't know what the mitigation measure is for these, nor am I suggesting that it is the County's responsibility. But I think it is important that this report recognize the potential for long-term impacts, to social cohesion. Will there be a construction web page for people and businesses to access with questions and concerns? This might be a valuable mitigation measure to add.	Addressed in SDEIS; Updated the SDEIS Potential Mitigation Section with proposed mitigation of providing a construction web page.	Sabrina Robinson
99932	Active Transportation Access Options	Bureau of Planning and Sustainability, Lora Lillard	Transportation- 7--23: The southern ramp on the westside of the river shown in Figure 26 and described in this section doesn't specify where it will be located. BPS has strongly argued against its location shown in Figure 26 as problematic for the future of development on SW 1st and SW Ankeny, which is historically one of the most important corners in the district. Providing a ramp that hems in this block's development footprint may ensure that this remains a parking lot for a long time to come. The narrative and figure should acknowledge alternative location being considered at the Mercy Corp parking lot. If this location won't work, we'd prefer no ramp to the one being shown in Figure 26.	As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on both the west and east sides of the Willamette River. The ramp being referred to has been eliminated in the updated SDEIS designs, replaced with a more compact stair and elevator access point. A determination of the exact west approach connection will be made as part of the Final Design phase.	Steve Drahota
99933	Active Transportation Access Options	Bureau of Planning and Sustainability, Lora Lillard	Transportation- 7--23: The ramp shown on the eastside of the river in Figure 26 is one of many different options being considered, and this narrative should clarify that. As you've heard concerns from many different agencies regarding the amount of concrete and stormwater issues related, there will need to be follow-up as to how those concerns will need to be addressed, including considerations for low-concrete carbon. The ADA ramp should also consider resting places to lessen the effects of slope over a long stretch of grade.	Comment acknowledged. As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on both the west and east sides of the Willamette River. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99934	Active Transportation Access Options	Bureau of Planning and Sustainability, Lora Lillard	Transportation- 7--23: Narrative regarding the westside elevator state: "An elevator was considered at this location and dismissed by the Multimodal Working Group based on security and operational concerns... Adding an elevator along with stairs would provide ADA access but would likely be the most expensive and add operational and maintenance costs that the other options would forego." Is this true? My understanding is that an elevator is still on the table, but our feedback has been that this raises a number of concerns. Aside from quantifiable measures such as delay, peak hour demand, reliability, capacity, etc. there are also qualitative considerations such as perception and safety, likelihood (or not) of using an elevator based on time of day, gender, race, age, ability, etc. Plus vandalism, crime and the maintenance costs of dealing with those issues continue to make the elevator a less viable option. These considerations should be evaluated/discussed.	Comment acknowledged. As part of the Transportation Supplemental Memorandum included with the SDEIS, the County assessed various connection options on the west side of the Willamette River. A determination of the exact west approach connection will be made as part of the Final Design phase.	Steve Drahota
99935	Active Transportation Access Options	Bureau of Planning and Sustainability, Lora Lillard	Transportation- 7--35: For the buildings to the south and north of "Temporary Impact Parking Lot A", it would be helpful to show all doors that access those buildings, not just the ones facing the parking lot, to get a better understanding of the impact of this closure. Also for transparency, this figure should call out that the Mercy Corp parking lot is being considered for a ramp location.	Additional doorway locations along the buildings of Parking Lot A, as depicted in Figure 12 of the Transportation Supplemental Memorandum within the SDEIS, have been added. As part of the Transportation Supplemental Memorandum included with the SDEIS, the County assessed various connection options on the west sides of the Willamette River. The ramp being referred to has been eliminated in the updated SDEIS designs, replaced with a more compact stair and elevator access point. A determination of the exact west approach connection will be made as part of the Final Design phase.	Steve Drahota
99936	Active Transportation Access Options	Bureau of Planning and Sustainability, Lora Lillard	Transportation- 7--60: These two paragraphs point to the error and inherent contradiction in the reliance on a safe connection that needs power to operate (an elevator) for a bridge that is being designed to be the critical piece of infrastructure to withstand the biggest emergency that our city will face.	Comment acknowledged.	Steve Drahota
99937	Transportation - Short term bike, ped & ADA	Bureau of Planning and Sustainability, Lora Lillard	Transportation- 7--88: The Hawthorne Bridge should be considered a detour route given the at-grade rail crossing on Morrison Bridge is a deterrent as noted here.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes and the Hawthorne Bridge has been added as a detour route. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase	Lewis Kelley

Comment ID	Topic	Comment By	Comment	Response	Response By
99938	Transportation - Short term bike, ped & ADA	Bureau of Planning and Sustainability, Lora Lillard	Transportation- 7--90: The Green Loop on 6th Avenue would provide a more direct detour for bicycles than the one shown.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase	Lewis Kelley
99939	Transportation - Short term bike, ped & ADA	Bureau of Planning and Sustainability, Lora Lillard	Transportation- 7--94: The Green Loop on 6th Avenue would provide a more direct detour for bicycles than the one shown.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase	Lewis Kelley
99940	Archaeological and Historic Resources	Bureau of Planning and Sustainability, Brandon Spencer-Hartle	Pg 8: Thank you for including reference to state and local planning regulations	Comment acknowledged.	David Ellis
99941	Archaeological and Historic Resources	Bureau of Planning and Sustainability	Pg 10: Thank you for expanding the APE to include both historic districts on the west side	Comment acknowledged.	David Ellis
99942	Archaeological and Historic Resources	Bureau of Planning and Sustainability	Pg 108: Inclusion of URM buildings is appreciated	Comment acknowledged.	David Ellis
99943	Archaeological and Historic Resources	Bureau of Planning and Sustainability	A-3: Please include Darcelle XV Showplace, which was added to the National Register in late 2020	Its presence in the APE is in DEIS errata 3.11.1.	David Ellis
99944	Archaeological and Historic Resources	Bureau of Planning and Sustainability, Brandon Spencer-Hartle	Belgian Block cobblestones are mentioned only in passing. The largest expanse of the blocks in the region is at SW1st and Ankeny. The quarry where the blocks were produced is National Register, so the blocks too deserve mention and possible eligibility evaluation.	The SDEIS technical report discusses the Belgian Block cobblestones. No Project effects to Belgian Block pavements have been identified. Those pavements will be evaluated as historic resources should potential effects be identified in the future and Project effects addressed. Any such evaluation and addressing of Project effects would take into consideration the 2021 Belgian Block report and City ordinances addressing use/reuse of the stones.	David Ellis
99945	Transportation - Short term bike, ped & ADA	Bureau of Planning and Sustainability, Lora Lillard	Transportation- 5--6: Hawthorne Bridge should be included in the indirect API for bikes and peds. This has brought up in an AT meeting with city staff. People moving E-W by bicycle and on foot may use Hawthorne Bridge to clear the rail road tracks and they may prefer Hawthorne over Morrison because the grades presented by the Morrison Bridge and its connection to the Central Eastside may not be desirable. Maps shown on p. 5-39 and 5-40 confirm that Morrison Bridge, though centrally located, may not be the route that people choose as a replacement for Burnside.	Comment Acknowledged. Mitigations have been identified, including detour routes and improvements along identified detour routes, and are addressed in the FEIS Mitigation section. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99946	Active Transportation Access Options	Portland Parks and Recreation, Tate White	Page 1: Additional analysis and outreach is definitely needed before making decisions on this topic. Making this 50 ft. grade difference in such a sensitive and constrained area is extremely complicated. What is your evidence that design refinements and supplemental analysis would not reveal new significant impacts? I realize the EIS is supposed to try to account for worst case scenarios but it can still acknowledge new issues may come up that will need to be minimized or mitigated.	Comment acknowledged. As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on both the west and east sides of the Willamette River. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future. If, at that time, additional impacts are discovered, the City could be required to study and possibly mitigate those impacts.	Steve Drahota
99947	Active Transportation Access Options	Portland Parks and Recreation, Tate White	Page 11: Thank you for talking about impacts to this shallow water habitat area and the case-dependent need to remove existing dock piles - designers who worked on the Esplanade are concerned about these impacts and should be engaged on them. As they are no longer with the City, I have forwarded the public link to them.	Comment acknowledged.	Steve Drahota
99948	Active Transportation Access Options	Portland Parks and Recreation, Tate White	Page 14: Appreciate that the visual impacts to the Eastbank Esplanade from viewers in Waterfront Park are being recognized as I almost made a comment about considering these more in the Visual Impacts section. Please add more about this to that section if possible. I also really appreciate the last comment of this section, thank you.	Comment acknowledged. A Revised Visual Resources Technical Report, with updated impacts, was included with the SDEIS.	Steve Drahota
99949	Active Transportation Access Options	Portland Parks and Recreation, Tate White	As stated previously, Portland Parks & Recreation is extremely concerned about the temporary (long-duration construction) and permanent impacts of an engineered ramp solution on the Eastbank Esplanade. Connectivity is important but not at the cost of a unique recreation experience and/or habitat disruption and loss. We would like to see more exploration and design of how the circular and longitudinal ramps options may differ in their impact levels (see Exhibit A EQRB DEIS CoP Comments EE Connection Concepts). Although these concepts need further exploration and design refinement, they provide great views while lessening impacts to the esplanade and shallow-water habitat. Exploration of these concepts may result in even better ramp ideas. Consider optimizing the elevator and stair options to make them more appealing and integrate CPTED design features promoting natural surveillance and lighting.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99950	Air Quality	City of Portland, Christine Kendrick	Pg 4: Second bullet point in section 4.1 describes OR DEQ as having State Ambient Air Quality Standards. DEQ's ambient monitoring program is to ensure the state meets the NAAQS. I have not seen a reference to State Ambient Air Quality Standards or seen these referenced in annual ambient monitoring reports, even the 2018 one listed as a reference. Could the authors provide a reference for this or removal. In later section, the authors correctly describe the air toxics ambient benchmark concentrations so it does not appear these are a mix-up of terms.	Comment acknowledged. No change. Oregon Administrative Rule 340, Division 202 provides the state's ambient air quality standards: https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=1530 the rules are referenced in the ODOT AQ Manual, see Section 2.2.2	Scott Noel

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99951	Air Quality	City of Portland, Christine Kendrick	Pg 4: See comment #1 for reference to state ambient air quality standards in section 4.2	Comment acknowledged. No change. Oregon Administrative Rule 340, Division 202 provides the state's ambient air quality standards: https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=1530 the rules are referenced in the ODOT AQ Manual, see Section 2.2.2	Scott Noel
99952	Air Quality	City of Portland, Christine Kendrick	Pg 7: Why isn't PM2.5 also listed with other transportation related pollutants in section 5.1?	Comment acknowledged. No change. PM2.5 is listed in 4.3.2	Scott Noel
99953	Air Quality	City of Portland, Christine Kendrick	Pg 8: Section 5.3 states that "Furthermore, DEQ's 10-year monitoring data indicates that criteria pollutants concentrations have been decreasing in the Project region." This inaccurate. Ozone has increased for the Portland area for 2016, 2017, and 2018 levels are above federal standards at 0.070ppm. (See Figure 38 and 39 in Oregon 2018 Air Quality Annual Report that is referenced) and increasing values in tables.	Comment acknowledged. No change. It's unclear if what the comment says is true about the previous 3-years since wildfire smoke is included in some of the years in question. We understand that Ozone is being closely monitored in the region but, regardless, the statement is true over the 10-year span it is referencing.	Scott Noel
99897	Acquisitions and Relocations	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please collaborate with City staff on project's relocation of Saturday Market to a temporary location during the bridge construction period. The new location for Saturday market should prioritize safety, accessibility, convenience for vendors and patrons of Saturday Market.	The County is prepared to coordinated with City staff on this. It's assumed that the City as property owner will have the lead role with Saturday Market.	Patricia Thayer
99898	Parks and Recreation	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please work with City staff and develop mitigation strategies that address PPR loss of revenue from events and programs that would have used Parks facilities during the construction phases of the project.	The County commits to continuing coordination with the City to address construction related PPR revenue impacts in advance of, as well as during, the Final Design phase and application for a non-park use permit.	Jennifer Hughes
99899	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	The City of Portland has protected viewpoint and view corridors (aka viewsheds) that are within the project area. These have regulatory requirements (e.g., height limits). There are terms and definitions found in the Central City Scenic Resources Protection Plan that should be reflected in the technical report.	Changes to the technical reports written for the DEIS were not revised for the FEIS. Where applicable, sections of the DEIS chapters were revised based on comments received during the DEIS public comment period and are in the errata chapters of this FEIS. For this comment, no change was made to the DEIS text because the comment did not impact the DEIS analysis.	Josh Carlson
99900	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	The area of impact needs to be expanded because there are height limits in the project area and over the bridge that are based on a protected view from the new bike/ped crossing over I84. That protected view needs to be included from the I84 bike/ped crossing viewpoint to the bridge.	Addressed in DEIS errata, section 3.12.1.	Josh Carlson
99901	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	There are two sets of regulations that protect views in Portland - 33.510 includes height limits, some of which are specifically to protect views, and 33.480 includes (s) overlay zones and designated viewpoints which have specific regulations.	Reference Land Use Technical Report section 4.1.3. Final design will consider pertinent City of Portland land use regulations.	Josh Carlson
99902	Utilities	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff to minimize impacts and maintain accessibility to Ankeny Pump Station	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Cory Burlingame
99903	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 7 - Figure 4.3: Add Title 33.510 and 33.480	Reference Land Use Technical Report section 4.1.3. Final design will consider pertinent City of Portland land use regulations.	Josh Carlson
99904	Parks and Recreation	Portland Parks and Recreation, Tate White	Please address how the awkward pit area created at the West end of the bridge where supports meet the seawall will be impacted and changed by bridge construction and/or mitigation. Coordinate with PBOT, BES, and PPR to determine the best solution for making this area safer for all.	Addressed in SDEIS, because the Refined Long-span Alternative will eliminate the pit area. The reconstruction of the area beneath the Burnside Bridge will be coordinated with PP&R, PBOT, and BES.	Jennifer Hughes
99905	Comment noted	Portland Parks and Recreation, Tate White	PP&R supports the recommended preferred alternative of the long span bridge with no temporary bridge.	Comment acknowledged.	Adrian Witte
99906	Active Transportation Access Options	Bureau of Planning and Sustainability, Rachael Hoy	Page 3-13 Under Option 5- typo mid sentence	Comment acknowledged. Typo Corrected as part of the SDEIS Chapter 3.	Steve Drahota
99907	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Page 8 - Figure 4.4: Add Title 33.510	Reference Land Use Technical Report section 4.1.3. Reference Land Use Technical Report section 4.1.3. Final design will consider pertinent City of Portland land use regulations.	Josh Carlson
99908	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 9 - Figure 2: Please expand the area of visual effects map to include the new bike/ped crossing over I84, which has a protected view corridor (aka viewshed) that will be impacted by the new bridge. The area of impact is beyond the "project area" and should include all identified areas of direct and indirect impact. The viewpoint on the new bike/ped crossing will be directly impacted by the bridge, in particular because there are height limits that extent into the project area and to the bridge that must be met.	Addressed in DEIS errata, section 3.12.1.	Josh Carlson
99909	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 9 - Figure 2: Please add the designated protected viewpoint and view corridors to the map (see the overlay zones, 33.480 map of protected viewpoints and Central City Scenic Resources Protection Plan)	Reference Visual Resources Technical Report Appendix C & D.	Josh Carlson
99910	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 10 - Figure 3: Please expand the area of visual effects map to include the new bike/ped crossing over I84	Addressed in DEIS errata, section 3.12.1.	Josh Carlson
99911	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 12: There is a detailed explanation of the view from the bike/ped cross found in the Central City Scenic Resources Protection Plan	Addressed in DEIS errata, section 3.12.1.	Josh Carlson
99912	Active Transportation Access Options	Bureau of Planning and Sustainability, Rachael Hoy	3-13 section 3.1 It does not seem as if all options are summarized in this section. Should there at least be some mention that there are other options put forward/being explored?	Comment Acknowledged. Other options are not part of the Refined Alternative and are addressed in the DEIS documents, chapter 2 provides an explanation of the options analyzed.	Lewis Kelley

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99913	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 33 - Figure 4: Please add the protected viewpoints and view corridors, as well as the primary focal features identified in the Central City Scenic Resources Protection Plan	Reference Visual Resources Technical Report Appendix C & D.	Josh Carlson
99914	Land Use	Bureau of Planning and Sustainability, Rachael Hoy	section 3 pg 58: In the 1st paragraph you can remove the footnote and reference to Central City 2035 -"when readopted" - the plan was readopted last July 2020.	Addressed in SDEIS.	Sabrina Robinson
99915	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 30 - Figure 7: Please add the view from the bike/ped crossing over I84 (the city can provide a high resolution image)	Addressed in DEIS errata, section 3.12.1.	Josh Carlson
99916	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 35 - Figure 5.2.2: When the bike/ped crossing over I84 is open, there will be a great view of the new bridge. Please add this to Commuting, Touring Travelers, Pedestrian and Bicyclist Travelers.	Addressed in DEIS errata, section 3.12.1.	Josh Carlson
99917	Land Use	Bureau of Planning and Sustainability, Rachael Hoy	section 3 pg 58: Under Impacts Common to all Build Alternatives: Why only call out Goal 5? What about Goal 7? Or any of the other applicable state goals? Is there another part of the BIS which offers a more detailed conversation on the different state goals? It could at least be referenced here	Addressed in FEIS: Goal 7 added. The Land Use technical report lists additional goals. Each technical report includes goals that are specific to that topic.	Sabrina Robinson
99918	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 42 - River Crossing, Image 1: This highlights something that can be changed with this project - we can enhance the view of the White Stag Sign by removing the 2 trees directly in front of the sign and are growing to block it and replacing those in a new location, leaving the sign visible from the north side of the new span	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Josh Carlson
99919	Land Use	Bureau of Planning and Sustainability, Rachael Hoy	page 61: Under Impacts from bike/ped options: When talking about west side the base zone in Skidmore/Old town area is Central Commercial - CX not Central employment	Addressed in FEIS.	Sabrina Robinson
99920	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 44 - Figure East Approach: See comment 10 - we have a high resolution image for the view from the bike/ped crossing	Addressed in DEIS errata, section 3.12.1.	Josh Carlson
99921	Parks and Recreation	Portland Parks and Recreation, Tate White	page 3-127: Sentences about events that take place in the Meadow and along esplanade routes being able to continue is misleading - I don't believe the County has engaged these groups or provided other proof/confirmation these events could still continue	Addressed in DEIS Errata Section 3.10.2 to indicate the events that may or may not be able to continue, however with the reduced impact area within Waterfront Park south of the bridge, the events will be less impacted than noted in the DEIS.	Jennifer Hughes
99922	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 56 - 6.3: The height of different alternatives should be considered. The protected view corridor from the I84 bike/ped overpass is within the project area. The decision about the bridge elements will have an impact on the view.	Addressed in DEIS errata, section 3.12.1.	Josh Carlson
99923	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 107 - Figure 34: Please either add a new view or replace this view with the protected viewpoint and view corridor from the bike/ped crossing over I84. That the view corridor the City is trying to protect in the long term and that will be enhanced by a new bridge. How the different options impact the overlay view corridor is important because there are height limits to consider.	Addressed in DEIS errata, section 3.12.1.	Josh Carlson
99924	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 1: Introduction: "...some stakeholders expressed concerns..." This is language that separates the main thrust of the project and the core project team from this consideration. Suggest change wording to "After completion of the technical reports the project team was concerned that the range of access options were incomplete" or similar to make it inclusive of the whole team and not sound like a fringe group.	Comment acknowledged. Changes to the Active Transportation technical report written for the SDEIS were not revised for the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the DEIS public comment period and are in the errata chapters of this FEIS. For this comment, no change was made to the SDEIS text because the comment did not impact the SDEIS analysis.	Steve Drahota
99891	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-24: "and 19 percent fewer pedestrians daily compared to providing a temporary bridge" Again, a significant impact to ped travel patterns that will need mitigation.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99892	Comment noted	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 2: "There is ADA and bicycle access..." This description of ADA access to the bridge being 500 feet east of the stairs seems irrelevant to the discussion about access between the Esplanade and the bridge. What happens at the intersection of MLK and Burnside (the 500' east reference) is not part of ADA access considerations between the bridge and the Esplanade.	Comment acknowledged. After further assessment, this context was deemed valuable enough to keep. No change made.	Adrian Witte
99893	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	Page 3-26 I am concerned that an Esplanade detour route along SE/NE MLK does not come close to approximating the safety, comfort, and quality of the off roadway path experience of the esplanade. Leisure walkers and runners are unlikely to feel comfortable switching from the trail to MLK boulevard. Can we find a route that may not be the most direct, but that more closely approximates (or can be mitigated to approximate) the quality of trail for recreational users? What mitigations will the project identify to provide the same level of separation from vehicle traffic? An esplanade detour route should apply the same traffic calming/vehicle diversion as proposed for greenway routes.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes to provide users more comfort and reduce risk. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99894	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 2: "The Stairway is primarily for pedestrians..." Worth noting that the stair was originally designed to provide ADA access (via the lift) and intended to provide--albeit minimally--for people bicycling by including a wheel gutter.	Comment acknowledged. Because, to the County's knowledge, the lift had not been made operational, we have elected to maintain the current text as written.	Steve Drahota

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99895	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	Unclear why the Esplanade detour route is along MLK but the ped detour route is along Grand. Will the project be mitigating both routes for ped comfort/safety?	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99896	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-29: This is a significant pedestrian detour. The Steel Bridge detour in particular is significantly out of direction for peds. The project may need to consider a circulator shuttle or other transit mitigation for peds.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified detour routes and potential transit mitigations. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99885	Environmental Justice and Equity	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 24: "While there is a which concentration of..." The homeless population has grown in North and NE Portland neighborhoods outside the direct impact API- will the Burnside Bridge construction phase result in more homeless population growth outside the Direct API? Please articulate the displacement of homeless populations in the direct impact area to areas beyond the Direct API	Thank you for your comment. Impacts to homeless populations are addressed in DEIS Section 3.9.5. During the construction period, all people, including houseless people, would be excluded from accessing the area under the bridge. The EJ analysis was not able to determine precisely where houseless populations would go in the future if excluded from the area under the bridge, nor the impacts beyond the Direct API. Social service organizations that directly serve the homeless community shared anecdotal evidence that houseless community members would locate to another nearby bridge such as the Morrison Bridge during the construction period.	Eduardo Montejo
99886	Environmental Justice and Equity	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 26: Mitigation Summary: Where is the discussion about the proposed public transit mitigation to access social service providers? Shouldn't it be in this table?	Proposed public transit mitigation is referenced in the Technical report under Chapter 8: Mitigation Measures, Attachment J Potential Mitigation Measures, and in DEIS Section 3.9.8 Mitigation. Final mitigation measures are addressed in the FEIS.	Eduardo Montejo
99887	Environmental Justice and Equity	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 29: Mitigation Summary: If the project will result in homeless population shift from the direct API to neighborhoods beyond the direct API (which have already seen an increase in homeless populations), than another project mitigation should be to provide facilities in those neighborhoods to accommodate services needed to address the increase in homeless population	Thank you for your comment. The refined mitigation strategies related to this topic are included in FEIS. The technical analysis did not determine the extent of potential homeless population displacements outside the direct API due to limited data on these populations. Multnomah County will continue coordinating with social service providers and partner agencies to identify and minimize potential displacement impacts through the design and construction phases.	Eduardo Montejo
99888	Environmental Justice and Equity	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 29: "All Build Alternatives..." All build alternatives should improve sidewalks, ADA, and active transportation facilities along the entire length of any ADA route, not just the ADA facilities at intersections with Burnside. For example, the proposed northwest ADA route from Burnside to NW 2nd to NW Couch to NW 1st - if this is the ADA route, then active transportation improvements should be made for the entire length of that route, not just the intersection at Burnside/2nd. this would apply to any ADA route the project is building	Thank you for your comment. ADA and active transportation improvements are addressed in the EJ Technical Report, DEIS, SDEIS, and FEIS.	Eduardo Montejo
99889	Environmental Justice and Equity	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 68: The transit passes from social service providers should be free	Transit passes are addressed in the FEIS Mitigation strategy. Multnomah County, TriMet, and the City will continue refining a transit pass program moving into the design and construction phases.	Eduardo Montejo
99890	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, April Bertelsen	Transportation- Chp 5 page 16: I propose multiple edits to section 5.3.5, regarding ETC. Starting with the section header should change to "Roadway, Transit and Freight Network." See attached recommended text with Track Changes in MS Word.	Comment acknowledged. The Transportation text within Chapter 3 of the SDEIS has been updated to address this issue.	Lewis Kelley
99883	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 2: "It should be noted that for all options..." Please clarify the difference between City Policy - structures need to be built to meet seismic standards - and the criteria developed for the bridge. Please articulate how this will need to be built to meet City seismic codes.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99884	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 2: Please revise to add description and evaluation of Double Loop and Long Spiral ramp options provided to EQRB team by City staff	Comment acknowledged. Those ramp types were not evaluated as part of the NEPA phase. If those are selected, then a NEPA Re-evaluation would be required during the Final Design phase due to the likelihood of additional impacts beyond those studied in the EQRB NEPA documents.	Steve Drahota
99882	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 2: How many elevator shafts/cabs on north and south sides of bridge?	As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on both the west and east sides of the Willamette River. If elevators are selected in the future, then the exact number of elevator cabs will be determined at that time (i.e., during the Final Design phase).	
99833	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 4: "This would likely require..." The above paragraph described the need to provide belvederes for storage space to separate "the queuing of bicycles and pedestrians waiting to cross the bridge from continuously flowing east-west bicycle traffic." Is this mention of "widening the bicycle and pedestrian facility" the same as the above-described belvederes?	For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
				As part of the FEIS / ROD, the context of belvederes are for providing occasional river views, not as a means to control continuously flowing east-west bicycle traffic. However, as applicable, they may be used as a temporary refuge for bicyclists.	Steve Drahota

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99834	Parks and Recreation	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	With consideration for bridge construction access, please minimize impacts to the Japanese American Historic Plaza, Bill Naito Legacy Fountain, existing mature trees, and other park features.	Addressed in the SDEIS Chapter 3, Parks and Recreation section. Minimization of impacts to the Japanese American Historic Plaza, Bill Naito Legacy Fountain, existing mature trees, and other park features has been addressed through the reduced construction area of the Refined Long-span Alternative.	Jennifer Hughes
99835	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 5: For both elevator options: Add description of vandalism and vandalism frequency typically seen with other Portland public elevators, frequency of elevator shutdowns from vandalism or damage, associated shut down time to repair, and annual maintenance costs	Comment acknowledged. As part of the Revised Active Transportation Options Memo included with the SDEIS, maintenance activities have been added to the text, but this would be a speculative detail to try to add. Furthermore, because there is no "standard" frequency for vandalism and shut-down repair times, adding this would be too speculative. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99836	Vegetation, Wildlife and Aquatic Resources	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and minimize and mitigate impacts to vegetation, threatened aquatic, and terrestrial species in the Willamette River and within the project impact area.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Rachel Barksdale
99837	Stormwater	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff on the implementation of stormwater facilities and implementation of best practices to: a-Improve stormwater runoff quality; b-Reduce stormwater runoff velocity and quantity; c- prioritize low maintenance; and d-Prioritize safety and minimize trespassing	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase. BES BMPs will be followed to the extent practical.	Cory Gieseke
99838	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 4: "This Traffic signal..." and coordinated with signal at MLK, Grand, NW 2nd, NW 3rd and other nearby signals as necessary	Comment acknowledged. The text was modified as part of the SDEIS updates.	Steve Drahota
99839	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 3: these assumptions Table 1 #3 and #4 are for the fill amounts for the ramp options shown. Please clarify that other alternatives being explored could have less fill impacts	Comment acknowledged. Because no ramp facility will be allowed to be suspended from the bridge, the EQRB design team doubts that other viable options will likely have less in-water impacts than those listed herein. If they are different, they should be of a small magnitude. This would be confirmed during the Final Design phase if a ramp is selected.	Steve Drahota
99840	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 3: From Lora Lillard/BPS: Aside from quantifiable measures such as delay, peak hour demand, reliability, capacity, etc. there are also qualitative considerations such as perception and safety, likelihood (or not) of using an elevator based on time of day, gender, race, age, ability, etc. Plus vandalism, crime and the maintenance costs of dealing with those issues continue to make the elevator a less viable option. These considerations should be evaluated/discussed.	For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99841	Vegetation, Wildlife and Aquatic Resources	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and minimize street tree loss and mitigate where other tree impacts cannot be avoided.	Comment acknowledged. As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on both the west and east sides of the Willamette River. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99842	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 3: "...could be peak times..." Okay, this addressed my point above. Suggest replacing this language with: "are likely to be times, especially during peak periods."	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Rachel Barksdale
99843	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 17: "Use of this location for a ramp structure..." Please articulate that when the Sat Mkt bldg. is demolished and after the bridge is built, it will be a vacant lot adjacent to full 1/4 block surface parking lot, resulting in a combined XX SF (XX Ac) redevelopment site. Please also articulate that redevelopment at this location is a strategic objective of the Skidmore/Oldtown Historic District Masterplan.	The text was modified as part of the SDEIS.	Steve Drahota
99844	Wetlands and Waters	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and minimize and mitigate net level rise impacts related to piers and support structures in the Willamette River.	As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on both the west and east sides of the Willamette River. The ramp being referred to has been eliminated in the updated SDEIS designs, replaced with a more compact stair and elevator access point. A determination of the exact west approach connection will be made as part of the Final Design phase. Although the exact SF is not provided in this Memo, the statement regarding the general intent has been included.	Steve Drahota
99845	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 3: "...most direct ADA-accessible route..." If touting directness as a benefit, should also discuss reliability and delay. Cannot discuss one operational evaluation criterion without addressing them all.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Greg Mazer
99846	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 19: Please provide dimensions of staircase, walkways, elevator cab	Comment acknowledged. Equivalent statements to that requested are provided in the subsequent text of that section of the Revised Active Transportation Options Memo included with the SDEIS.	Steve Drahota
				Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota

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				Comment acknowledged. It is believed that the context is more appropriate as a comparison of the connection options, not the bridge quantities.	
99847	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 3: "As shown in Figure 1..."It would be good to put this shallow water fill in the context of the shallow water fill that will be part of the bridge construction. Is this 50% more, 10% more, 1% more?	For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahotka
99848	Social and Neighborhood Resources	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and evaluate/explore the impacts of unreinforced masonry buildings (UMBs) at eastern and western Burnside bridgeheads. In a CSZ event, UMB's may collapse or result in building debris on the Burnside Bridge eastern and western approaches.	Thank you for your comment. Effects to unreinforced masonry buildings are being evaluated during construction. Currently, no plans to investigate CSZ effects on adjacent buildings, but design has incorporated gap between bridge and buildings.	Sabrina Robinson
99849	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 24: Please provide additional graphics and perspective illustrations at sidewalk levels to understand impact to sidewalk zone and visibility to building facades and streetscape for all options	Additional sidewalk improvement graphics were added as part of the Revised Active Transportation Options Memo included with the SDEIS.	Steve Drahotka
99850	Social and Neighborhood Resources	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and minimize and mitigate impacts to social service providers, their employees, their clients, and their residents from accessibility and construction impacts to social service provider operations	Comment acknowledged. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Sabrina Robinson
99851	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with TriMet and City staff and explore mitigation options such as, but not limited to, providing free transit passes for social service provider employees and clients impacted by the bridge construction detours	Addressed in FEIS Mitigation section. The County has committed to mitigating transit impacts and the County commits to continuing this coordination with the City and TriMet in advance of, as well as during, the Final Design phase.	Adrian Witte
99852	Utilities	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and minimize and mitigate impacts to public and private utilities.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Cory Burlingame
99853	Public Services	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and minimize and mitigate impacts to Portland Fire and Rescue (PFR) Station #1 emergency operations and response routes. Develop service strategy for Station #1 and coordinate with emergency routes of other fire stations for response area east and west of the Burnside Bridge project area and along detour routes.	Coordination with PFR on detours, routing, and service strategy has occurred throughout the EIS process and will continue into the Final Design and Construction phases.	Garrett Augustyn
99854	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Zef Wagner	Transportation- Page 4-2: Bullet point with heading "Blueprint for Urban Design" incorrectly states that Grand and MLK are ODOT facilities. While it's true that they are designated Hwy 99E, that is just a highway wayfinding system and does not mean they are ODOT facilities. Grand and MLK are owned and maintained by the City of Portland and are not subject to the Blueprint for Urban Design.	Comment acknowledged. The text within Transportation Supplemental Memorandum included with the SDEIS has been revised to address this comment. Text was previously changed to correctly state ownership of the streets and that the BUD is instructive guidance that the City is not required to follow.	Adrian Witte
99855	Acquisitions and Relocations	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and evaluate the permanent impacts of the bridge infrastructure (column placement, bridge clearance, visibility for ROW users, signalization and street lighting, short and long-term ROW maintenance requirements) on public ROW in the project area.	The County commits to continuing this coordination with the City as part of the Final Design phase.	Patricia Thayer
99856	Acquisitions and Relocations	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and minimize temporary construction phase impacts to operations and facilities within public rights-of-way (ROW) in the project area	The County commits to continuing this coordination with the City as part of the Final Design phase.	Patricia Thayer
99857	Acquisitions and Relocations	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and transfer dedicated ROW acquired with project to the City after the project via intergovernmental agreement.	The County commits to continuing this coordination with the City as part of the Final Design phase.	Patricia Thayer
99858	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Zef Wagner	Bullet point with heading "Central City 2035 Plan" incorrectly states that the bridge does not have a Freight designation. All streets have a freight designation of some kind. The Burnside Bridge is a Local Service Truck Street, the lowest classification, meaning it does not have to be designed for large trucks or emphasize freight movement. It is meant only for local deliveries.	Comment acknowledged. The text within Transportation Supplemental Memorandum included with the SDEIS has been revised to address this comment. Text was updated to recognize freight designation.	Adrian Witte
99859	Acquisitions and Relocations	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and address and resolve project impacts to existing parking lot lease agreements in the project area.	The County commits to continuing this coordination with the City as part of the Final Design phase.	Patricia Thayer
99860	Acquisitions and Relocations	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and secure any easements needed for the bridge project or bridge maintenance from Division of State Lands (DSL). City will need to be included in negotiations prior to appraisal of ROW for any easement associated with DSL.	The County commits to continuing this coordination with the City as part of the Final Design phase.	Patricia Thayer
99861	Sustainability and Climate Change	(BES) Bureau of Environmental Services, Nishant Parulekar	3.21.16 Existing mechanical and electrical equipment in Portland has failed during enduring heat waves due to material specifications that cannot accommodate continuous high temperatures. Inadequate temperature specifications can also reduce the lifecycle of an asset. If the mechanical and electrical equipment in the new bridge design accounts for higher temperature ratings, then this climate impact should not be as relevant as the two listed in the report. Otherwise, consider adding it to the list.	Deferred to Final Design: With the opportunity to design the Mechanical & Electrical equipment to be more resilient than the existing equipment (i.e., possess a temperature range that can be tailored to fit the future conditions), we feel this can be accommodated relatively easily during the Final Design phase. As such, we recommend that the current language be maintained.	Kelly Carini

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99862	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Zef Wagner	Transportation- Page 5-30: It's confusing that in earlier sections of the document it says the EQRB project will keep the existing cross-section with one bus lane eastbound and two general lanes in each direction. But in this section it says the westbound bus lane will be put in prior to the bridge, and the bridge will incorporate it. It's unclear what the DEIS is really saying and what the modeling analysis is based on, with the bus lane or without the bus lane. It's also worth saying that we have no imminent plans to extend a westbound bus lane across the bridge or further west to 23rd. It has been analyzed at a high level but has not been prioritized in the Rose Lane project. It would be more likely done as a future BRT project, potentially after the bridge is reconstructed.	Comment acknowledged. The existing conditions are not discussed in the SDEIS. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase. Language on the westbound bus lane qualifies that such a facility could be completed depending on the city's schedule for Rose Lane updates. It purposefully leaves flexibility at the request of PBOT. For the FEIS / ROD, the Preferred Alternative includes a two General Purpose lanes in the Westbound direction, and a combination of 1 General Purpose and 1 Bus Only lane in the Eastbound direction.	Adrian Witte
99863	Sustainability and Climate Change	(BES) Bureau of Environmental Services, Nishant Parulekar	3.21.16 The project could follow the City's low carbon concrete initiative to minimize the GHG from the bridge alternative as one mitigation strategy. Greening the bridge to mitigate radiated heat on high temperature days and provide some level of carbon capture could be another mitigation strategy.	Comment acknowledged. The project will strive to recycle or repurpose the approach spans as stated in the FEIS/ROD mitigation section. Additionally, the project is adhering to the Greenroads sustainability rating system and will seek to implement sustainable practices in the Construction phase of the Project.	Kelly Carini
99864	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	"Vehicle, bicycle and pedestrian traffic would detour over both the Steel Bridge and the Morrison Bridge." Note that many peds/bikes will likely chose to detour over the Hawthorne Bridge, given the physical barriers and lack of connectivity (freeway ramps, etc.) to the Morrison Bridge. Hawthorne bridge is even called out in figure S-13	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes and the Hawthorne Bridge has been added as a detour route. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99865	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	"For the Full Closure option, all bicycle and pedestrian traffic would need to be detoured to other Willamette River bridges, primarily the Steel Bridge (adding 0.8 miles and 7 minutes travel time for cyclists and about 0.6 miles and 14 minutes for pedestrians) or the Morrison Bridge (adding about 1 mile and 8 minutes travel time for cyclists and about 18 minutes for pedestrians)." Please note that many peds/cyclists travelling from the Buckman neighborhood will make the decision upstream to divert to the Hawthorne Bridge, as opposed to the Morrison, which is not as bike/ped friendly as the Hawthorne. Also, please note that an additional 14 to 18 minutes of pedestrian travel time is a significant increase to people walking, perhaps as much as a doubling of overall travel time.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified detour routes and potential transit mitigations. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99866	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Zef Wagner	Transportation- Page 5-12: Narrative repeatedly calls the bus lane a "BAT" lane, but that is inaccurate. There is nowhere to turn right to along the bridge itself, therefore it's a true "bus-only lane." BAT lanes are used where there are driveways and intersections where cars would use the lane to turn right. That is not the case on the bridge. This term is used elsewhere throughout the document and should be corrected wherever it appears.	Comment acknowledged. The text within Transportation Supplemental Memorandum included with the SDEIS has been revised to address this comment. BAT changed to bus only lane in SDEIS.	Adrian Witte
99867	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	"Metro 's Regional Travel Demand Model estimates that not providing a temporary bridge could result in an approximate 2 percent reduction in bicyclists crossing the Willamette River and 19 percent fewer pedestrians compared to providing a temporary bridge." A 19% reduction in pedestrian travel is significant and requires mitigation. Please provide transit circulation options for all peds (not just social service clients). This could be free transit passes for peds that live/work in the neighboring areas and/or a circulator shuttle to shuttle peds across the river via other bridges.	Addressed in the FEIS Mitigation section. Mitigations have been identified including bicycle and pedestrian detour routes and mitigations along routes to improve pedestrian bicycle comfort while the Burnside Bridge is closed. Transit mitigations have also been identified including detour routes, transit passes and bus bridging. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99868	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	Page 3-4 the bike/ped API should extend south to the Hawthorne bridge as many travelling from the Buckman neighborhood will make the upstream decision to use the Hawthorne Bridge rather than the Morrison which is not as bike/ped friendly as the Hawthorne.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes and the Hawthorne Bridge has been added as a detour route. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99869	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Zef Wagner	Transportation- Page 5-12: Traffic/Freight and Active Transportation sections have numbers of daily users, but transit only says it is "important." Data should be provided on daily transit riders across the bridge, number of lines served, number of bus trips, etc. This is all easily obtainable information from TriMet.	Comment acknowledged. The text within Transportation Supplemental Memorandum included with the SDEIS has been revised to address this comment. Existing transit ridership, transit lines, and more is outlined in section 5.3.6	Adrian Witte
99870	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	The safety API should encompass the entire boundary of the bike/ped API. Please extend the safety API to include all areas of the bike/ped in the FEIS.	Comment acknowledged. Changes to the technical reports written for the DEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the DEIS public comment period and are in the errata chapters of this FEIS. For this comment, no change was made to the FEIS chapters text because the comment did not impact the findings from the DEIS analysis.	Lewis Kelley
99871	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Zef Wagner	Transportation- Page 4-3: Bullet point with heading "2035 Transportation System Plan" incorrectly states that the bridge has a City Bikeway designation. It is in fact a Major City Bikeway. It also neglects to mention the Local Service Truck Street designation.	Comment acknowledged. The text within Transportation Supplemental Memorandum included with the SDEIS has been revised to address this comment. The text also updated the designation in SDEIS Section 4.	Lewis Kelley
99872	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Michelle Marx	Elevators can be problematic as they often do not work and present security concerns. They also introduce delay for peds/bikes as opposed to ramps even when working.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota

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				Comment acknowledged. This statement is reflective of multiple comments made by members of the ADA community when asked specifically about the mid-bridge crossing option.	
99873	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Michelle Marx	"some concern has been raised about pedestrian safety within mid-block crossings." This is anecdotal and speculative. Please cite data (I am not aware of data/studies indicating that pedestrian hybrid beacons are unsafe).	For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99874	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Michelle Marx	"This extended length could create conflicts between experienced bicyclists, recreational users, and pedestrians." It is unclear what about the length of a ramp would potentially create conflict between users.	The conflict is a result of multiple user types simultaneously traversing a shared 12' wide space along a 1000+ ft long, multi-use switchback ramp climbing at a 5% grade. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99875	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-21. "The majority of these transit riders would likely switch to other transit routes that are more convenient during the construction period." This impact to other transit lines should be mitigated for to minimize impacts to transit riders and pedestrians who chose to switch to transit during bridge closure (i.e., running extra buses along those routes to absorb that added demand).	Comment acknowledged. Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified detour routes and potential transit mitigations. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
99876	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Michelle Marx	page 3-24 "Bridge construction-related closures (18 to 30 months, depending on the alternative) of the Vera Katz Eastbank Esplanade would impact bicycle and pedestrian users of that trail throughout the construction period. This would force users to detour around construction, adding out-of-direction travel, or to forgo trips along the Willamette River all together." This is a very long closure of the Esplanade and a big impact to active transportation. Any detour routes will need to be heavily mitigated to approximate the quality, comfort, and safety of the off-roadway path experience of the Esplanade.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified detour routes and potential transit mitigations. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99877	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	3-14 Section 3.1 RE Option 3 - Please clarify the characterization of "extended length". Please provide analysis of other ADA connections. The EB approach from Bond St to crest of Tilikum is over 1000' long, the Steel Bridge ramp and path to Oregon St/Interstate Ave intersection is over 1000', and the WB path from the EE to crest of Tilikum is almost 1500' long.	Comment acknowledged. Acknowledging that there are other instances of 1000' long ramps in the Portland Metro area, characterizing a 1000' long ramp with a 5% grade as an "extended length" has been deemed reasonable by the Project team. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99785	Parks and Recreation	Portland Parks and Recreation, Tate White	Page 3-161: Appreciate the section "Esplanade Access Ramp - All Alternatives." It provides useful info relevant to the Parks and Recreation and 4(f) sections. Would be great to incorporate more of this detail into those sections or at least those tech reports - apologies if I missed it.	Comment acknowledged, thank you. The SDEIS Section 4(f) analysis incorporates discussion of the ADA access options.	Jennifer Hughes
99786	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, April Bertelsen	Page 7: Label lines on the map to indicate which blue lines have multiple bus routes along them and what these routes are, particularly as they cross the Burnside, Steel Morrison and Hawthorne bridges. This could be labeled similar to TriMet maps. See example map, zoom into Central City: https://ride.trimet.org/?tool#/	Comment acknowledged. The Transportation text within Chapter 3 of the SDEIS has been updated to address this issue. The text has been edits to reflect changes and maps updated.	Lewis Kelley
99787	Floodplain and River Hydraulics	BDS Site Development, Jason Butler-Brown	Portions of the project are located within the flood hazard area as defined by Portland City Code, Chapter 24.50 Flood Hazard Areas. As such, the development is subject to the applicable requirements of that chapter.	Comment acknowledged. Addressed in Section 3.15 of the DEIS, which refers reader to EQRH Hydraulic Impacts Analysis Technical Report. Applicable regulations - including PCC 24.50 - are discussed in Section 4.3 of the Hydraulic Impacts Analysis Technical Report.	Julie garnet
99788	Floodplain and River Hydraulics	BDS Site Development, Jason Butler-Brown	The project is located within Zone AE of the FEMA Special (100-year) Flood Hazard Area as shown on FEMA Flood Insurance Rate Map (FIRM) panel 4101830093E, dated 10/19/2004. The FEMA base flood elevation is 32.0 feet NAVD 1988 datum based on the Willamette River Flood Profile published in the November 2010 FEMA Flood Insurance Study. In addition, the project area is located within the community determined 1996 Flood Inundation Area. Based on river gauge data at the Morrison Street Bridge, the 1996 flood was 1.5 feet higher than the FEMA base flood elevation. As such, the adjusted base flood elevation = 32.0 ft + 1.5 ft = 33.5 feet NAVD 1988 datum.	Comment acknowledged. Addressed in Section 3.15 of the DEIS, which refers reader to EQRH Hydraulic Impacts Analysis Technical Report. As described in Section 4.4. of the Hydraulic Impacts Analysis Technical Report, PCC 24.50.060.D restricts increase to the base flood elevation as defined by FEMA FIRMs. (The Metro Urban Growth Management Functional Plan 03.07.1010 also defines the design flood elevation as the 100-year flood as set by the FEMA Flood Insurance Study.) Therefore, the FEMA base flood elevation is used as the legal target for the flood impact analysis rather than the 1996 Inundation Area flood elevation. Furthermore, the 1996 Flood Inundation Area, as mapped in the City's public GIS, is shown to be smaller/lower than the mapped FEMA base flood boundary at the project location. For consideration, however, please provide documentation of the 1996 flood elevation and associated datum (noting that the Morrison Street gauge datum is approximately 5 feet higher than NAVD88 based on https://www.portlandoregon.gov/transportation/article/70676).	Julie garnet

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99789	Floodplain and River Hydraulics	BDS Site Development, Jason Butler-Brown	The project proposes both temporary and permanent development within the floodway as shown on the FIRM referenced above. In this case, development includes the both placement and removal of structures and fill.	Addressed in Section 3.15 of the DEIS, which refers reader to EQRB Hydraulic Impacts Analysis Technical Report, where it is discussed in Sections 4.4 and 7.5. Also addressed in the FEIS, which includes detailed hydraulic modeling of both placement and removal of structures and fill included in the temporary and permanent development.	Julie garnet
99790	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 10: Without detailed design, it is hard to understand the level of impact from the elevator, piers and elevated walkways required to connect the north and south sides of the bridge. Please provide more detailed graphics including bridge deck and lower level dimensions of walkways, elevator cabs, stairways, bike channels, etc.	Comment acknowledged. As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on both the west and east sides of the Willamette River. For these, many of the attachment graphics have been updated. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99791	Vegetation, Wildlife and Aquatic Resources	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 10: Please articulate the impact of removing the existing bridge pier adjacent to I-5 and the shallow water habitat created in it's place. What are the impacts to this newly created habitat area from each of the options?	Addressed in DEIS Errata.	Rachel Barksdale
99792	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 10: "... excavation of contaminated soils..." This statement about excavation of contaminated soils is expressed as an impact, with a negative implication. Rather, is this excavation and removal of contaminated soils a benefit rather than a negative?	Unfortunately, no. After discussing with NMFS and other resource agencies, the net removal is generally classified as a negative impact (even though it also possesses the removal of a small amount of contaminated material).	Steve Drahota
99793	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 9: Please revise to include travel times for users for the ramp options (including double loop and long spiral ramp options provided to the EQRB team by the City) and the elevator options. Provide analysis of travel time delay for active transportation users when elevator is not operating for service or repair. Please include assumptions for frequency of elevator closures per week/month vs how often a ramp would be closed for service or repair.	Comment acknowledged. As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on both the west and east sides of the Willamette River. For these, travel times for the switchback ramp and elevator options have been provided. Estimates for the frequency of closures are believed to be too speculative to add into the memo. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99794	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 9 "To provide access to only..." and would have not met City design requirements for Major City Bikeway designation.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99795	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 17: Why do safety considerations about elevators result in their dismissal here but not on the east side? What is the difference?	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99796	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 9: Please explain that these impacts can be minimized with different design options and construction approaches	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future. Regarding differences, all ramp options would require an additional 2-3 years of Eastbank Esplanade closure compared to a Stairs+Elevator option. This is due to the challenges with constructing a ramp on the south side of the Burnside Bridge. If selected during the final design phase, in collaboration with the CMGC contractor, more clarity for how to minimize these impacts will be sought. For further details, please see the Revised Construction Approach Technical Report included with the SDEIS.	Steve Drahota
99797	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 9: Please explain that these impacts can be minimized with different design options and construction approaches	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota

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				Comment acknowledged. For the NEPA phase without direct contractor involvement, the County has determined that the most safe and reasonable approach to constructing a ramp connection at this location would be to temporarily remove portions of the floating ramp as described in this memo. The County is unwilling to consider temporary floating Eastbank Esplanade alignments placed further into the Willamette River.	
99798	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 8 "There are temporary impacts..." Please explain that these impacts can be minimized with different design options and construction approaches	For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99799	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 8: "... 23,000 CY of rip rap removal..." Please describe the amount of rip rap removal required for other ramp configurations as previously discussed with the EQRB team	Comment acknowledged. These rip rap quantities are a reasonable approximation for all of the ramp options considered by the EQRB project team. Differing options would have differing impacts, and it those studies would occur during the Final Design phase, as needed, if a ramp is selected. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99800	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 8: "...some concern has been raised..." As noted when this was mentioned above, provide data, not "concerns". Is there data indicating that mid-block signalized crossings are unsafe? If so, mention it. If not, remove this comment.	Comment acknowledged. Given the consistent and considerable feedback about mid-block crossings from multiple ADA advocates during multiple meetings, this text was deemed accurate and reasonable. As such, the statements within the memo have been preserved.	Steve Drahota
99801	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 8: "...some concern has been raised..." Please articulate what concerns are no way to evaluate or understand what "some concerns" means	Comment acknowledged. Given the consistent and considerable feedback about the safety risk of mid-block crossings from multiple ADA advocates during multiple meetings, this text was deemed accurate and reasonable. As such, the statements within the memo have been preserved.	Steve Drahota
99802	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 8: "Additionally, the introduction of mid block crossings..." Please explain why this is included in this explanation when you have previously described the mitigation (belvederes) for this potential conflict as part of the design assumptions in 2.2.4.1. Are you saying the potential conflict zones will be greater than the design of the belvederes can handle?	The primary function of the belvederes is to provide river views, not to provide a transportation design function. As such, belvederes should not be considered as a potential Active Transportation conflict relief points for bicycle / pedestrian interactions.	Steve Drahota
				Comment acknowledged. These are meant to include the physical conflicts associated with space constraints along a 1000+ ft long x 12' wide multi-use switchback ramp climbing at a 5% grade.	
99803	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 8: "This extended length could create conflicts..." Please articulate what these conflicts are	For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99804	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 8: Please clarify - the upland EE south of the bridge would be permanently changed into a ramp	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
				All ramp options would require additional permanent fill compared to a Stairs+Elevator option. If selected during the final design phase, in collaboration with the CMGC contractor, more clarity for how to minimize these impacts will be sought. For further details, please see the Revised Constructability Technical Report included with the SDEIS.	
99805	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 8: Please describe the construction techniques that can be used to minimize permanent fill impacts on the south side of the bridge for the other ramp configurations as previously discussed with the EQRB team	For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99806	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 7: "This would likely require widening..." Repeated from above. This is describing the above-mentioned belvederes, right?	Yes, that is the context of the widening.	Steve Drahota
99807	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 7: "When the bicycle/pedestrian mid-block crossing is activated..." This traffic stop configuration would be confusing to the drivers - if vehicle stopped on west side of bridge for eastside ped/bike crossing, the driver would not be able to see why they have to stop and may proceed through the signal. Explain why they cannot stop at the ped/bike crossing and program the signals to flush traffic across the bridge for bridge lift events.	Because ship navigation has the priority over any on-bridge users, the on-bridge users are not permitted to delay marine traffic by stopping on the movable span. As such, traffic would need to stop outside the limits of the movable span, whether it is because of an on-bridge crossing for bicyclists/pedestrian or because of ship navigation.	Steve Drahota

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99808	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 7: Please describe the temporary closure impacts for the other ramp configurations as previously discussed with the EQRB team. The impacts of the other ramp configurations are different and will require different construction assumptions to be articulated - please articulate how the construction assumptions would be different, and please clarify Multnomah County's objective to work with the contractor to minimize construction impacts and optimize construction efficiency.	Regarding differences, all ramp options would require an additional 2-3 years of Eastbank Esplanade closure compared to a Stairs+Elevator option. This is due to the challenges with constructing a ramp on the south side of the Burnside Bridge. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future. If selected during the final design phase, in collaboration with the CMGC contractor, more clarity for how to minimize these impacts will be sought. For further details, please see the Revised Constructability Technical Report included with the SDEIS.	Steve Drahota
99809	Acquisitions and Relocations	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please work with City staff and find location for the temporary relocation Saturday Market and all Saturday Market annual operations, maintenance, materials and equipment. Optimize accessibility, public information, visibility, and advertising to the new location of Saturday Market.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Patricia Thayer
99810	Social and Neighborhood Resources	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please work with City staff and design the bridge and create mitigation strategies that will optimize the west end of Burnside Bridge/Waterfront Park project area for the return of Saturday Market and other Park activities. Optimize accessibility, public information, visibility, advertising, complete restoration of facilities for annual operations and maintenance	Comment Acknowledged. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Sabrina Robinson
99811	Acquisitions and Relocations	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	...provide relocation services needed for the return of Saturday Market to Waterfront Park.	The County commits to continuing this coordination with the City and businesses as part of the Final Design phase in accordance with the Uniform Act.	Patricia Thayer
99812	Cumulative Impacts	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	When considering construction timelines, please schedule maintenance projects on their other Willamette River crossings to occur prior to Burnside Bridge construction to prevent additional bridge closures while the Burnside Bridge is closed. Coordinate with other regional and local agency bridge and transportation projects to minimize local and regional river crossing impacts to transportation network.	The County intends to avoid elective closures of other County bridges during the construction of a new Burnside Bridge, and will coordinate with other concurrent transportation projects, such as ODOT's I-5 Rose Quarter project. (This is the County's stated intent)	Shane Phelps
99813	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please coordinate with TriMet and City staff and explore mitigation for impacts to pedestrians for loss of convenient access across the Burnside Bridge between the Central Eastside and the Skidmore/Oldtown neighborhood during the project construction period. Consider mitigation options such as, but not limited to, fareless or free transit zone or free transit shuttle between the east and west sides of the project construction area.	Addressed in the FEIS Mitigations section. Mitigations have been identified, including detour routes, improvements along identified detour routes and possible transit mitigations. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99814	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	As the EQRB project moves forward into FEIS and design/engineering phases, please heed the following considerations: a-Management, operations, and maintenance of the project area and public multimodal transportation detour routes directly adjacent to or through the project area;	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99815	Land Use	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please minimize impacts to properties that would reduce potential for land use redevelopment. Explore other locations for a westside ADA ramp and stair facility, such as between SW Naito Parkway and SW First Street, or other locations. The ramp and stair facility will prioritize safety, convenience, and accessibility with an emphasis on urban design and placemaking.	Addressed in SDEIS.	Sabrina Robinson
99816	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 7: "This includes the removal..." Unclear what this means - the floating bridge section is not "at-grade" or "upland".	Text modified within the Revised Technical Report as part of the SDEIS.	Steve Drahota
99817	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 7: "...beyond what is already needed..." Please describe the construction techniques that can be used to minimize temporary impacts to the floating section of the EE for the other ramp configurations as previously discussed with the EQRB team	For the NEPA phase without direct contractor involvement, the County has determined that the most safe and reasonable approach to constructing a ramp connection at this location would be to temporarily remove portions of the floating Eastbank Esplanade ramp as described in this memo. The County is unwilling to consider temporary floating Eastbank Esplanade alignments placed further into the Willamette River.	Steve Drahota
99818	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 7: "...23,000 CY of riprap..." Please describe the amount of rip rap removal required for other ramp configurations as previously discussed with the EQRB team	Comment acknowledged. These rip rap quantities are a reasonable approximation for the ramp options considered within the SDEIS.	
99819	Social and Neighborhood Resources	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 7: "...23,000 CY of riprap..." Please describe the amount of rip rap removal required for other ramp configurations as previously discussed with the EQRB team	For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99819	Social and Neighborhood Resources	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please coordinate with City staff and minimize impacts to Skidmore Old Town Historic District residents, businesses, and property owners.	Addressed in SDEIS: added mitigation to provide a construction information web page.	Sabrina Robinson
99820	Public Involvement	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with neighborhood and business groups and organizations such as the Central Eastside Industrial Council, the Kerns Neighborhood Association, and the Old Town Community Association.	Comment Acknowledged. Community coordination is ongoing.	Sabrina Robinson

Comment ID	Topic	Comment By	Comment	Response	Response By
99821	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 6: "This extended length could create..." Any (and every) transportation facility in the city has the potential to create conflicts between users. We do not see conflicts on the Tilikum (~2000 feet), nor do we see conflicts on the ramp between the Esplanade and the Rose Quarter. Where does this idea of "extended length" and "experienced bicyclists" conflicting with "recreational users" and "pedestrians" come from?	Comment acknowledged. The facilities referenced in the comment are each much wider than the 12' width being proposed for the switchback ramp analyzed. As such, these statements are deemed accurate by the Project team. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99822	Parks and Recreation	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue coordination with City staff and minimize adverse impacts to parks and recreation facilities, operations, and programs and develop mitigation strategies for project 4(f) impacts.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Jennifer Hughes
99823	Parks and Recreation	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Bridge type and design choices should optimize Waterfront Park column design and placement, minimize column width, minimize depth/thickness of bridge deck, and improve the user experience under the bridge from the edge of the river to Naito Parkway, and throughout the park for recreation activities, special events, and stakeholder programming (including but not limited to Saturday Market and the Japanese American Museum of Oregon).	Comment acknowledged, thank you. Multnomah County has worked to achieve the least detrimental impacts while providing an seismically resilient bridge.	Jennifer Hughes
99824	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 6: "This extended length could create..." any shared facility has the potential to create conflicts between users, including elevators. Please clarify that this can be an experience common to all options.	While this experience is common to all options, the conflict is more acute for switchback ramps of this length and width. The text has been modified as such within the Revised Active Transportation Options Memo included with the SDEIS. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99825	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 5: "...600 Cy of fill..." It'd be good to know how this compares to volumes associated with the rest of the project. Is this a lot? Is it a small fraction of overall? Context here is important.	Comment acknowledged. For the purposes of this memo, the comparison of the fill quantities to the bridge fill quantities is not deemed important. The purpose of this report is to quantify the differences in the ADA connection options, as if it is a facility with Independent Utility. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99826	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 5: "...incurs minimal delay to traffic..." change to "motor vehicle traffic"	Text modified as part of the Transportation Supplemental Memorandum included with the SDEIS.	Steve Drahota
99827	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please initiate design explorations with City staff for safe and reliable access from the Eastbank Esplanade to the Burnside Bridge Deck that will accentuate the placemaking aspects of the Eastbank Esplanade and exhibit the highest level of urban design, aesthetics, lower maintenance, and reliability.	Comment acknowledged. The City has initiated design options for the Eastbank Esplanade connection. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99828	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 5: I don't think the discussion of "conflict zones" is valid. This is a common traffic condition: streams of traffic crossing at right-angles. It happens at every intersection in the city. It would be addressed with marked crosswalks. That is how PBOT is designing the crossings of "Better Naito Forever". In describing "conflict zones" with traffic, every intersection is a conflict zone. The project is designing "conflict zones" at Burnside and 2nd and Burnside and MLK... Similarly, the project cannot just say "some concern has been raised about pedestrian safety within mid-block [signalized] crossings." They need to back this up with data rather than "concerns". There are going to be pedestrian safety issues at 2nd and Burnside and MLK and Burnside. What does the data say about the safety of signalized mid-block crossings?	Comment acknowledged. Given the consistent and considerable feedback about mid-block crossings from multiple ADA advocates during multiple meetings, this text was deemed accurate and reasonable. As such, the statements within the memo have been preserved.	Steve Drahota
99829	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 5: For both elevator options: Add that conflicts can occur with shared use of elevator, especially during peak times. Runners, walkers, bicyclists, tourists, people on scooters, and people who rely on mobility devices will all be maneuvering around the elevator doors to get on and get off and make their way back to the Esplanade or the bridge active transportation facility. Elevator loading areas as shown have limited space for people getting in/getting out, and if people had bikes or mobility devices that require more room to maneuver, the conflicts would get worse	Addressed in SDEIS: Text added as part of the Revised Active Transportation Options Memo included with the SDEIS. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99830	Floodplain and River Hydraulics	Bureau of Development Services (BDS), Morgan Steele	3.15.4: The last paragraph on this page mentions the City's requirement for balanced cut and fill; however, the Floodplain section does not mention how to achieve this. Will the potential impacts from achieving balanced cut and fill be included in future drafts?	Addressed in Section 3.15.4 of the DEIS. Narrative specifically identifies and discloses this requirement to satisfy the NEPA process. The County commits to continuing close coordination with the City regarding the cut/fill balance in advance of, as well as during, the Final Design phase.	Julie gamet

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99831	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 5: For both elevator options: Please add description of how bicyclists would use the wheel gutter to push a bike up or guide a bike down 10 flights of stairs when the elevator is not operating. Please add description of what types of bikes wheel gutters can accommodate and which they cannot. Please add impacts to e-bike users with the wheel gutter - the bikes are heavy and would be hard to push up the steps and control going down steps	This level of detail is not deemed necessary for a conceptual design within a NEPA document. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99832	Wetlands and Waters	Bureau of Development Services (BDS), Morgan Steele	3.17.1: The City uses the top of bank, not the OHWM, to define the River Setback (See Figure 475-1 in Zoning Code Section 33.475). Top of bank is defined in 3.910.030 as well as exemplified in the Measurements chapter of 33.930.150. The majority of Central Reach has a top of bank that has been adopted by City Council. This may be used to define the top of bank in the API.	Addressed in DEIS errata.	Greg Mazer
99750	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	"Option 2 has..." Please articulate the north/south elevator/stair option impacts shallow water habitat. Options 3 and 4 have the greatest opportunity for design that could minimize impacts. Option 2 puts an elevator shaft, mechanical equipment, and large amounts of elevated pathway above the water level. with so little design information, it is impossible to identify the impacts.	Because the types of connection options are so vast, the impacts assessed in the SDEIS are deemed reasonable for the range considered. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99751	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Transportation 3-5: The bicycle and pedestrian indirect API should include the Hawthorne bridge and approaches. Many more people will use the Hawthorne and avoid the Morrison because the Hawthorne approaches go over the freight RR tracks. Using the Morrison can result in getting stuck alongside a very long freight train event	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes and the Hawthorne Bridge has been added as a detour route. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99752	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	3-12: 3.1: RE Option 1 - Include upgrades to ADA routes identified by the project that extend beyond the intersection of 2nd Ave - this includes NW 2nd to NW Couch, NW Couch to NW 1st, NW 1st to MAX station. Include upgrades for ADA route on the south side of Burnside if that is the preferred ADA route on that side of the bridge	Mitigation decisions will not be finalized until Record of Decision. Updated Active Transportation mitigations are being discussed with PBOT staff.	Steve Drahota
99753	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	"Both options with ramps..." Please articulate how different ramp options and construction techniques can minimize impacts to the Eastbank Esplanade accessibility	If selected during the final design phase, in collaboration with the CMGC contractor, more clarity for how to minimize these impacts could be minimized will be sought. For further details, please see the Revised Constructability Technical Report included with the SDEIS. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99754	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	3-12: 3.1 RE Option 2 - A ramp/stair facility in this location conflicts with infill redevelopment objectives in the Skidmore/Oldtown Historic District Plan. Also, there is no bike facility on SW 1st Ave - it is a limited access transit street - this location has limited use	Comment acknowledged. As part of the Transportation Supplemental Memorandum included with the SDEIS, the County assessed various connection options on the west side of the Willamette River. A determination of the exact west approach connection will be made as part of the Final Design phase.	Steve Drahota
99755	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Transportation 3-13: RE Option 4 - Please clarify that options 4 and 5 have the additional benefit of more direct connections to Better Naito and Waterfront Park, in addition to the Oldtown MAX Station.	Comment acknowledged. The Transportation text within Chapter 3 of the SDEIS has been updated to address this issue.	Steve Drahota
99756	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 13: "This greater footprint would remove up to 20 existing trees on the east bank..." Would this be a permanent removal or just during construction? Could trees be replanted?	For the switchback ramp being considered, this would likely be a permanent removal that could not be replanted. Subject to the in-water impact and exact ramp configuration, there is a possibility that some of the trees could be replanted. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99757	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Transportation 3-13: "There could be peak times..." Please provide travel time data	Addressed in FEIS. A range of elevator and stair options will be further analyzed in the final design phase. The County commits to continuing coordination on this with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99759	Public Involvement	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	How will the bridge type selection and decision-making process be memorialized? Consider developing a Bridge Type Selection Final Report. This public-facing report can summarize the analysis and community engagement that resulted in the chosen bridge type. The report can include urban design expectations for the final design and engineering of the bridge and all its multimodal connections. The report can be presented to Portland City Council for discussion and acceptance.	A report will be prepared related to bridge type selection.	Sabrina Robinson

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99760	Visual and Aesthetic Resources	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	For the bridge type selection, please coordinate with City staff and integrate the following considerations and acknowledge the following policies in the selection process: a-The experiences above and below the bridge, connections to the adjacent urban context and the variety of different public spaces on both sides of the river; b-A seismically resilient design with an aesthetic that sets the tone for future urban development and growth; c-Comprehensive plan policies that support designing for both the built and natural environments, helping to define the character of a place – more specifically, please consider Policy 3.4 - Strive for a built environment that provides a safe, healthful, and attractive environment for people of all ages and abilities; Policy 3.8 - Encourage high-performance design and development that demonstrates Portland's leadership in the design of the built environment, commitment to a more equitable city; and Policy 3.11 - Enhance and celebrate significant places throughout Portland with symbolic features or iconic structures that reinforce local identity, histories, and cultures and contribute to wayfinding throughout the city. Consider these especially at bridges, rivers, and viewpoints.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Josh Carlson
99761	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 13: "The added structure of the ramps and their support columns..." This is not especially a natural looking area of the river... There's a freeway just a few feet to the east, fencing, and an entire urban environment behind that. In that context how significant is the effect on the "natural aesthetics of the river"?	Based on discussions with the Portland Parks Bureau, this effect could be meaningful. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99762	Comment noted	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please work with City staff and develop a complete mitigation plan that meets city submittal requirements for permits	Comment acknowledged. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
99763	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Page 15: This description needs to include improvements along the length of the entire ADA route for north and south sides. This would include sidewalk and ADA ramps along 2nd from NW Couch to NW Ankeny, NW Couch to First, SW Ankeny to 1st, and along 1st between Ankeny and Couch.	Addressed in SDEIS: Text added	Steve Drahota
99764	Cumulative Impacts	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please work with City staff and strategically collaborate on construction phase sequencing and mitigate Project impacts to Social Service providers, Portland Park facilities and programming, and multimodal transportation operations on adjacent transportation facilities. The sequence of construction phases will need to be evaluated during the design and engineering phases with the assistance of the Project construction contractors, and in coordination with other local and regional projects.	Coordination on mitigation measures began during the DEIS and continued through the FEIS phase. Mitigation measures can be found in the FEIS/ROD mitigation section. Additionally, coordination with the City and Social Service providers will continue through the Final Design and Construction Phases.	Shane Phelps
99765	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please work with City staff and develop a process to identify and evaluate pedestrian and bicycle detour route options that emphasize safety, convenience, reliability, and physical separation from traffic. Improve active transportation connections to these detour routes.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99766	Parks and Recreation	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	The impacts to Waterfront Park from construction activities are significant and need to be carefully considered. In coordination with City staff, develop construction access and work area options in Waterfront Park, identify impacts of those options, and develop mitigation strategies to address the impacts. Create a decision-making process to evaluate the options, impacts and mitigations to arrive at a preferred approach for bridge construction activities in Waterfront Park.	Addressed in the SDEIS Chapter 3 Parks and Recreation section. The SDEIS identifies a reduced construction area within Waterfront Park. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Jennifer Hughes
99767	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	The DEIS Preferred Alternative includes .5-mile long directional bike facilities on the north (westbound) and south (eastbound) sides of the bridge. With access points to Eastbank Esplanade and Naito Parkway proposed on the south side of the bridge, accessing those connections from the north side of the bridge is necessary. Safety, convenience, and accessibility should be prioritized with City Vision Zero and Complete Street policies in the design and engineering of at-grade or under-bridge active transportation facilities on, across, or under the Burnside Bridge.	Vision Zero will be an important consideration for the selection of each connection type.	Steve Drahota
99768	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	The Eastbank Esplanade, both a park and transportation facility, is a rare jewel within the urban necklace of Portland riparian access and recreation assets along the Willamette River. Access to the Eastbank Esplanade from the Burnside Bridge shall prioritize reliability, accessibility for all, safety, convenience appropriate to the expected conditions and congestion, and the highest standards of urban design that enhances the Eastbank Esplanade experience for a diverse range of users.	Comment acknowledged. These considerations will be part of a selection process for the connections during the Final Design phase. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99769	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please refine and optimize the longitudinal (along the length of the bridge), double loop and long spiral ramp concepts as per attached Exhibit A: Eastbank Esplanade Connection Concepts. Please engage with landscape architects, urban designers and engineers to explore these and other ramp options.	Comment acknowledged. These considerations may be made as part of the connection selection process during the Final Design phase. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota

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99770	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 15: "... would provide ADA access to the Skidmore Fountain..." Stairways do not provide ADA access.	Comment acknowledged. The Revised Active Transportation Options Memo included with the SDEIS has been updated such that the street sidewalk improvements would provide the ADA access.	Steve Drahota
99771	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 15: "...but it adds a mid-block, traffic-signalized, bicycle/pedestrian crossing..." Why does the mid-block crossing at the west end not trigger the same concerns about mid-block crossings and staging/queuing/stopping as discussed with the east end mid-block crossing?	A mid-block crossing at the west end raises similar concerns to that on the east end. The text within the Revised Active Transportation Options Memo included with the SDEIS has been updated to address this issue.	Steve Drahota
99772	Parks and Recreation	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Waterfront Park, and the surrounding area, represents the pinnacle of Portland livability priorities – a park built where highway era transportation facilities once occupied valuable frontage on the Willamette River. The bridge type should optimize Portland Parks and Recreation use of Waterfront Park for recreation and programming.	Addressed in the SDEIS Chapter 3 Parks and Recreation section. The SDEIS Refined Long-span alternative minimizes impact to the Park and Recreation resources as well as other important resources in the vicinity.	Jennifer Hughes
99773	Social and Neighborhood Resources	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Prioritize access to Waterfront Park, and Better Naito and provide safe, reliable, convenient, and the highest standards of urban design for access to transit facilities, social service providers, Saturday Market and land uses in the Skidmore-Oldtown Historic District.	Addressed in SDEIS: The SDEIS addresses the refined alternative and its impacts to Waterfront Park including a narrower shaded area over Waterfront Park providing a more open feeling for users and less columns in the park than the No-Build Alternative.	Sabrina Robinson
99774	Public Involvement	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Develop a process to engage neighborhoods and community stakeholders with identification of issues and development of solutions to address issues created by project circulation and access opportunities.	Addressed in SDEIS: added a mitigation strategy of providing a construction information web page.	Sabrina Robinson
99775	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Improve connections from the SE Ankeny Greenway to proposed detour routes and to the proposed Burnside Bridge active transportation facilities	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99776	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	It will be important to the City that the identification of logical detour routes and a strategy for continual optimization of traffic operations to manage congestion at other Willamette River bridgeheads and adjacent neighborhoods be developed to address impacts from Burnside Bridge construction detours	Comment acknowledged. The text within Transportation Supplemental Memorandum included with the SDEIS has been revised to address this comment.	Adrian Witte
99777	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	It will be important to the City that the identification of freight bottlenecks caused by construction detours and strategy for continual optimization of freight traffic operations to minimize freight travel delay be included in the project traffic management strategy.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified freight detour routes and potential transit mitigations. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
99778	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please coordinate with City and TriMet staff and prioritize transit customer convenience and minimize travel delay for transit passengers impacted by the multi-year bridge construction period	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified detour routes and potential transit mitigations. The County commits to continuing coordination on mitigations with the City and TriMet in advance of, as well as during, the Final Design phase.	Adrian Witte
99779	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please coordinate with City and TriMet staff and optimize conditions for future streetcar operations: a-Explore potential to reduce sharp curve of Couch street westbound for more efficient future streetcar operations; and b-During Burnside Bridge construction, and with any design decisions regarding the future implementation of streetcar, please minimize the potential for sideswipes of streetcar vehicles.	Comment acknowledged. The text within Transportation Supplemental Memorandum included with the SDEIS has been revised to address this comment. This was considered in the option development and selection process. An alignment with more gentle curves was eliminated because of ROW acquisition to reduce costs, i.e., higher costs overall and increased natural resource impacts. Final design will continue to consider future streetcar in the Revised Preferred Alternative.	Adrian Witte
99780	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please explore mitigation for transit service impacts by optimizing bus service during bridge construction period. Mitigation should minimize transit travel delays along the Steel Bridge transit detour for the length of the construction period and should include metering vehicle traffic for more efficient transit operations	Addressed in FEIS Mitigation section. The County has committed to mitigating transit impacts and the County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
99781	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	With City and TriMet staff coordination, please explore mitigation to transit service impacts to MAX and local bus route transit services on SW First St and in the vicinity of the project construction area.	Addressed in FEIS Mitigation section. The County has committed to mitigating transit impacts and the County commits to continuing this coordination with the City and TriMet in advance of, as well as during, the Final Design phase.	Adrian Witte
99782	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	With City and TriMet staff coordination during the bridge planning and design, please do not preclude future implementation of westbound transit priority travel lane across the bridge.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes two General Purpose lanes in the Westbound direction, and a combination of 1 General Purpose plus 1 Bus Only lane in the Eastbound direction. With this lane assignments, a future Westbound bus only lane could be added.	Adrian Witte
99783	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Roger Geller	Page 16: "...would provide ADA access to the Skidmore Fountain..." The stairway "combined with the sidewalk...would provide ADA access..." How does a stairway provide ADA access?	Comment acknowledged. The Revised Active Transportation Options Memo included with the SDEIS has been updated such that the street sidewalk improvements would provide the ADA access.	Steve Drahota
99784	Land Use	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please continue evaluation of impacts to private properties and preserve conditions for future development opportunities as per Central City 2035 Plan objectives	Comment acknowledged, thank you. The project will continue to evaluate impacts and their affects on future development opportunities per the Central City 2035 Plan objectives.	Sabrina Robinson
99662	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please provide dimensions of staircase, walkways, elevator cab	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota

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99663	Social and Neighborhood Resources	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please work with City staff and minimize construction closures for the Eastbank Esplanade, Waterfront Park, Japanese American Historical Plaza, and Better Naito.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Sabrina Robinson
99664	Wetlands and Waters	Bureau of Planning and Sustainability, Mindy Brooks	5.2.1: The City's wetland mapping has been updated as of November 2020 and will be updated again in June 2021.	Comment acknowledged. There are no wetlands in the API. Updated mapping data was reviewed and there are no changes to what is already included.	Greg Mazer
99665	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Please articulate how other design options and construction techniques can reduce these estimated impacts	The temporary and permanent fill quantities are a reasonable approximation for all of the options considered by the project team. For the option selected during the final design phase, in collaboration with the CMGC contractor, more clarity for how to minimize these impacts will be sought. For further details, please see the Revised Constructability Technical Report included with the SDEIS. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99666	NEPA Process	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	The comments provided for the DEIS review serve as the basis for development of the FEIS and development of preliminary design and engineering plans for the project. What is the process to address issues and document results?	All comments received on the DEIS were reviewed prior to preparing the SDEIS and the FEIS. Formal responses to DEIS comments are included in the Final EIS in Attachment A.	Shane Phelps
99667	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	With respect to the active transportation connection options shown in the DEIS for the connection to the Eastbank Esplanade, evaluate and address concerns for ramp, stair, elevator, or other options for the bridge connection to the Eastbank Esplanade: City concerns with public elevator safety, reliability, accessibility, and maneuverability to/from and in/out of elevator shafts for all users, convenience, and long-term value-add to the Eastbank Esplanade will need to be included in the evaluation; and City concerns with ramp grades, need for resting areas, environmental impact of additional columns in river, aesthetic impact of elevated ramp structures on Eastbank Esplanade, downhill speed differential between users on ramp	Comment acknowledged. The Revised Active Transportation Options Memo included with the SDEIS has been updated to address these issues. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
99668	Visual and Aesthetic Resources	Bureau of Planning and Sustainability, Mindy Brooks	Pg 115: Trees should not be replaced within the view of the White Stag Sign.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Josh Carlson
99669	Transportation - Short term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, April Bertelsen	3.1, page 4: Include TriMet ridership data for the bus Lines 12, 19 and 20. Reporting transit mode share is important. Ideally also include the total weekday daily passenger loads of all three lines crossing the bridge. Traffic volumes are reported in this chapter. So should transit riders. These riders are directly impacted by construction impacts that detour and delay buses, along with the passengers getting on and off the bus at the bus stops in the API. Also report the line level ridership of all three lines. Combined that is ~25,000 passengers based on Fall 2019 TriMet data. These riders are indirectly impacted by bus delays that result in buses arriving late to stops further down the bus line. This is the ripple effect of transit delay and unreliability. At a minimum include these stats from the Transp. Tech Report page 5-31: "A total of 259,000 average daily transit riders cross through the direct API among all of the bus, MAX, and streetcar routes. 34,000 of these boardings occur during the PM Peak Hour."	Comment acknowledged. The text within Transportation Supplemental Memorandum included with the SDEIS has been revised to address this comment. A summary of impacts to transit has been provided in the SDEIS consistent with a summary of information for other modes and topics.	Adrian Witte
99670	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Communication Text: 473156 With respect to the active transportation connection options shown in the DEIS for the connection to the Skidmore/Old Town Historic District, evaluate and address concerns for ramp, stair, elevator, or other options for the bridge connection to the street level: City concerns for the long-term redevelopment potential of the west side of the block adjacent to SW 1st between SW Ankeny and Burnside	As part of the Transportation Supplemental Memorandum included with the SDEIS, the County assessed various connection options on the west side of the Willamette River. A determination of the exact west approach connection will be made as part of the Final Design phase.	Steve Drahota
99671	Wetlands and Waters	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	The lowered level of the Willamette River seawall and adjacent seawall alcove under the west side of the Burnside Bridge is a result of the Burnside Bridge pier and is an ongoing hazard that needs to be addressed. The proposed partial removal of the bridge pier may cumulatively make the problem worse. With the proposed removal of the entire bridge, girders, and piers, and new bridge built, the proposed changes at the seawall and alcove (also referred to as "the pit") under the west side of the Burnside Bridge will need to be evaluated, have options identified, and address this impact.	Comment acknowledged. Options have been considered.	Greg Mazer

Comment ID	Topic	Comment By	Comment	Response	Response By
99672	Environmental Justice and Equity	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	The EQRB DEIS and FEIS phases, along with any project design or engineering, should generally meet Comprehensive Plan Goals and Policies with special focus on: Goal 3A: A City designed for People... designed to serve the needs and aspirations of all Portlanders...public investments reduce disparities and encourage social interaction to create a healthy connected city.; Policy 2.4 Eliminate burdens: Ensure plans and investments eliminate associated disproportionate burdens (e.g. adverse environmental, economic, or community impacts) for communities of color, low-income populations, and other under-served or under-represented groups impacted by the decision. 2.4.a: Minimize or mitigate disproportionate burdens in cases where they cannot be eliminated. 2.4.b: Use plans and investments to address disproportionate burdens of previous decisions; Policy 3.3 Equitable development: Guide development, growth, and public facility investment to reduce disparities; encourage equitable access to opportunities, mitigate the impacts of development on income disparity, displacement and housing affordability; and produce positive outcomes for all Portlanders.	Thank you for your comment. The FEIS does not specifically cite Portland Comprehensive Plan Goals but will generally meet these goals and policies.	Eduardo Montejo
99627	Acquisitions and Relocations	Therese Devoe	The proposed "off ramp" to Naito through the current Mercy Corps parking lot will significantly impact the safety of Mercy Corps and U of O students, team members and staff. There is very minimal parking in the area and the thought of walking blocks in that part of town that has become a hot bed for drug use is terrifying. Thanks for reconsidering that aspect of the new bridge project.	Thank you for your input. A decision for the type of connection will be made as part of the Final Design phase.	Patricia Thayer
99628	Comment noted	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>The U.S. Environmental Protection Agency has reviewed the Federal Highway Administration's Draft Environmental Impact Statement for the Earthquake Ready Burnside Bridge in Multnomah County, Oregon (CEQ Number 20210016; EPA R10 Project Number 19-0009-FHW). Our comments are provided pursuant to Section 309 of the Clean Air Act and the National Environmental Policy Act.</p> <p>The DEIS analyzes the potential environmental impacts associated with a proposal to construct a seismically resilient Burnside Street crossing of the Willamette River in Portland, Oregon. This action will ensure the new Burnside Bridge will remain fully operational and accessible for vehicles and other modes of transportation immediately after a major earthquake. The project will also provide a long-term, low-maintenance safe crossing for all users for the next 100 years. The existing Burnside Bridge is 90 years old and cannot fulfill its lifeline designation after predicted earthquakes in the area. The bridge corridor is reflected in regional plans as a primary east-west emergency transportation route.</p> <p>For analysis of potential impacts from the proposed bridge project, the FHWA, jointly with the Oregon Department of Transportation and Multnomah County, are considering four build alternatives and a no action. The DEIS identifies replacement of the existing Burnside Bridge with a long-span approach and a no temporary bridge option as the preferred alternative. Construction of this alternative will require up to 7 acres of new permanent right-of-way easements and last about 5 years.</p>	Comment acknowledged.	Shane Phelps
99629	Public Involvement	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	The construction of the Alternative may still result in potentially adverse impacts to resources within the analysis area and will require mitigation measures to reduce the impacts. EPA recommends FHWA and project partners ensure that the planned activities are implemented in a manner protective of human health and the environment. For that, EPA supports continued coordination with the other federal and state agencies, affected tribes, and other impacted stakeholders, particularly adjacent land and property-owners to the project area, to minimize impacts.	Comment acknowledged. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Sabrina Robinson
99630	Comment noted	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	EPA also recommend that the Final EIS include additional clarifying or missing information as described in the attached detailed comments. Thank you for the opportunity to provide comments on this DEIS. If you have questions about our comments, please contact Theo Mbabaliye of my staff at (206) 553-6322 or at mbabaliye.theogene@epa.gov, or me at (206) 553-1774 or at chu.rebecca@epa.gov.	The FEIS responds to all EPA comments.	Shane Phelps

Comment ID	Topic	Comment By	Comment	Response	Response By
99631	Wetlands and Waters	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbaliye	<p>Potential impacts to water quality and aquatic resources</p> <p>The project activities may impact water quality and aquatic resources, resulting in changes to water quality parameters (sedimentation and turbidity, and total suspended solids) in the affected Willamette River segment. EPA recommends the FEIS:</p> <ul style="list-style-type: none"> • Provide information on the most recent EPA-approved Water Quality Standards for the State of Oregon and implications for water quality protection within the Willamette River in the analysis area and vicinity. EPA believes it is important for the public to know the State's WQS to determine the extent this project would impact water quality. The DEIS discusses water quality for the affected Willamette River reach in the analysis area. EPA recommends including information on the applicable WQS criteria and beneficial uses; 	<p>Potential sedimentation risks will be mitigated via BMPs during construction. BMPs, risk to water quality from construction activities, and mitigation requirements have been included in the DEIS (see Section 3.17).</p>	Greg Mazer
99632	Hazardous Materials	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbaliye	<p>Hazardous materials and related impacts</p> <p>The proposed project has the potential to mobilize contaminants currently in soils and sediments, resulting in impacts to water quality within the Willamette River and to aquatic life and fish. The DEIS indicates that because of the proposed project, petroleum products may be accidentally spilled to the ground and contaminate soils and the Willamette River. This may particularly occur within actively used staging areas, as well as in-water and near-shore works. Paint, acids, solvents, asphalts, and other chemical pollutants may be used at construction sites and be spilled directly into the Willamette River or carried to the River via stormwater runoff. Removal of structures which contain contaminants such as lead, polychlorinated biphenyls (PCBs), and asbestos may also occur. Additionally, construction of river and stream crossings have the potential to stir up in-water sediments and riverbank soils contaminated with metals, PCBs, and polycyclic aromatic hydrocarbons, resulting in increased potential for impacts to water quality and aquatic life. Because of these potential impacts, EPA recommends the FHWA and partners:</p> <ul style="list-style-type: none"> • Coordinate with EPA's Superfund Program in implementing the project so that planned activities are consistent with relevant contaminated site cleanup and monitoring goals and actions. The DEIS indicates the existence of contaminated sites just south of the analysis area in an area designated as the Portland Harbor Superfund Site, and the possibility that more contaminated sites could be discovered during construction and operation of the project. The EPA Remedial Program Manager for the Portland Harbor Superfund Site is Hunter Young. Contact information for Hunter Young is: (503)-326-5020 or young.hunter@epa.gov. EPA also recommends coordinating with ODEQ's Northwest Region Cleanup Program to ensure the FEIS identifies all the contaminated sites in the planning area and discusses measures to minimize project impacts and meet state requirements; 	<p>The project will coordinate with EPA's Superfund Program for planned activities prior to and during construction. The FEIS/ROD mitigation section contains specific measures to reduce impacts from possible releases of hazardous materials and identifies mechanisms for monitoring and responding to releases.</p>	Kelly Carini
99633	Air Quality	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbaliye	<p>Potential impacts on air quality</p> <p>Regarding air quality impacts, EPA recommends the FHWA and partners:</p> <ul style="list-style-type: none"> • Expand the monitoring data trends discussion to include other air toxics, not just benzene, and related state health benchmarks in the FEIS;4 	<p>bullet 1: no change. See tech report for expanded discussion of MSATs. bullet 2: no change. While it is true that predictions of MSATs are possible, the changes and effects of MSATs from roadway projects are not well understood from a health standpoint. This information is provided in the technical report on uncertainties around MSATs analysis. This is typical for FHWA/ODOT projects. bullet 3: no change. See project description for details on construction process. bullet 4: no change. we understand the desire by EPA to have continuous monitoring of construction pollutants; however, there is no regulatory requirement to do so. As such, ODOT/FHWA handles these discussions qualitatively as is the case with the NEPA effort. See tech report for additional detail. bullet 5: no change, information already provided in EIS via tech report. bullet 6: changed as requested. bullet 7: unclear what change is being requested.</p>	Scott Noel

Comment ID	Topic	Comment By	Comment	Response	Response By
99634	Environmental Justice and Equity	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Environmental justice and vulnerable populations</p> <p>EPA appreciates the extensive outreach to social service providers and community facilities to help inform decisions to reduce project construction impacts to unhoused individuals and other vulnerable community members that depend on these critical services. Several of these providers, such as Portland Rescue Mission and Central City Concern, are located within or provide services in the project area. The preferred alternative is proposed without a temporary bridge during construction, which makes it difficult for clients to cross the river and access services provided by Portland Rescue Mission and Central City Concern. The DEIS also includes several mitigation measures to reduce the anticipated impacts. EPA supports the mitigation measures and recommends the FHWA and partners commit to implement these measures in the FEIS. For example, the proposed offer of transit tickets to affected groups, preferably free of charge, will be an important commitment.</p>	<p>Thank you for your comment. The FEIS mitigation strategies address action to minimize, offset, or avoid anticipated impacts on homeless and houseless populations within the Project Area. Multnomah County is committed to continuing coordination with the City and social service partners to mitigate negative impacts to homeless/houseless community members throughout the design and construction periods.</p>	Eduardo Montejo
99635	Vegetation, Wildlife and Aquatic Resources	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Potential impacts to biological resources</p> <p>EPA recommends the FEIS include information on working with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and as appropriate, with Oregon Department of Fish and Wildlife. This would include describing any recommended measures to reduce risks and protect biota and habitat discussed in the DEIS. The DEIS indicates the proposed project activities may impact federal and state protected species occurring in the project area/vicinity, such as threatened Chinook, Coho, and Steelhead salmon. The impacts are related to the anticipated loss and degradation of suitable habitats and cover; increased turbidity in the Willamette River and marine environment; and higher than optimal noise levels during project construction activities (e.g. installation of piles and piers and associated use of heavy equipment or machinery). We also encourage the FHWA and partners to include information in the FEIS of the Section 7 of the Endangered Species Act consultations with the Services, as well as coordination with other agencies. We appreciate plans to obtain Biological Opinions from NMFS and USFWS.</p>	<p>FHWA conducted coordination throughout the project with USFWS, NOAA Fisheries and ODFW. A No Effect Determination was made for the project for threatened and endangered species regulated by USFWS. FHWA consulted with NOAA Fisheries under Section 7 of the Endangered Species Act resulting in a Biological Opinion that was issued by NOAA Fisheries on July 13, 2021. The FEIS/ROD includes information regarding the Section 7 consultation and coordination with other agencies in Chapter 5, Attachment C and Attachment F. Mitigation measures are included in the mitigation table for the FEIS/ROD.</p>	Rachel Barksdale
99636	Public Involvement	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Public participation in this DEIS NEPA analysis</p> <p>EPA appreciates the FHWA efforts to involve stakeholders in the project planning to date. In addition, we believe that it will be important for the FEIS to disclose steps that the agency and partners have taken to ensure effective public participation in this project NEPA analysis during the ongoing COVID-19 pandemic.</p>	<p>Comment acknowledged. Addressed in FEIS: includes a public involvement section summarizing public outreach and engagement efforts.</p>	Sabrina Robinson
99637	Construction Methods	Environmental Protection Agency (EPA), Rebecca Chu, Theogene Mbabaliye	<p>Monitoring and adaptive management</p> <p>The proposed project has the potential to impact a variety of resources for an extended period and many data are still missing or not yet available. EPA recommends the project be designed to include an environmental inspection and mitigation monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. The EIS document needs to describe the monitoring program and how it will be used as an effective feedback mechanism so that any needed adjustments can be made to the project to meet environmental objectives during its operation and maintenance. For example, the FEIS could discuss plans for monitoring emerging contaminants in the Willamette River as a result of demolition of the old and construction of the new bridge and taking corrective action if pollutant levels exceed standards or pose a risk to human health and the environment.</p>	<p>Addressed in the FEIS Mitigation section. The project will include an environmental inspection and mitigation monitoring program. This will be created in the final design phase and implemented during construction.</p>	Shane Phelps
99638	Public Involvement	Jan Stein	<p>Hi my name is Jane Stein and I'm a Portland Resident and I just want to let you know that I appreciate your effort to deal with earthquakes in the city. I just want to let you know I actually experienced an earthquake while I was sleeping. My roof totally caved in on me and needless to say it was a shocking experience to me. I was living in Italy when this happened. I was in the Navy. Anyway I could testify to anybody who wants to know about surviving an earthquake and trying to keep your ducks in one basket. If you ever have any questions for me you can call me at [phone]. Again my name is Jane Stein and I am an earthquake survivor. To be asleep and have this happen to you is... beyond words. Anyway thank you for all that you're doing to try to alleviate negative things from happening from an earthquake. It can be really really scary. Thanks a lot for listening to me, bye bye and take care.</p>	<p>Comment acknowledged. Thank you.</p>	Sabrina Robinson

Comment ID	Topic	Comment By	Comment	Response	Response By
98969	Social and Neighborhood Resources	Margaret Sprinkle	I hope that the decision that is made ensures that the Burnside Skatepark is kept intact. This park provides an excellent social, physical, and cultural outlet for all ages in the city. My son grew up going to the park to clear his head before writing a paper or studying for a test in high school. He is still a regular there, staying in touch with his roots and helping to ensure a safe, positive park experience for all the citizens of the city. Not everyone would see a skatepark as a positive outlet in the city, but I do, and as a mom, I have experienced it firsthand.	Comment acknowledged. Addressed in SDEIS: discusses the refined alternative which would keep the skatepark intact and only require a minimal closure during bridge construction.	Sabrina Robinson
98970	Project Cost	Eleanor Hagan	In my first year of college, I learned in my mechanical engineering class that truss bridges are the most safe and cost effective design.	For some site conditions, this might be true. For the Burnside Bridge site, due to its topography, span length, and vertical clearance needs, this is not the case.	Steve Drahota
98971	Preferred Alternative	Eleanor Hagan	In my first year of college, I learned in my mechanical engineering class that truss bridges are the most safe and cost effective design. The photos of the design for the bridge chosen in the alternative does not look like a truss bridge. I understand the need for specific locations and the environmental impacts, but I do feel that the overall design of the structure of the bridge could be re-examined, as well as the materials of the bridge and more data on weight, pressure, and flexibility. However, we would like to raise our concerns and objections about two potential options for pedestrian access to the bridge that could severely impact our Headquarters property.	The exact bridge type selection for the East Approach will be made as part of the Final Design phase. The West Approach and movable span bridge types were selected as part of the Refined Preferred Alternative in the SDEIS.	Steve Drahota
98972	Active Transportation Access Options	Hugh Donnelly	The Environmental Impact Statement Attachment G (Detailed Graphics of Alternatives) shows two designs (figures 33 and 34) that would use a large portion of our property to provide pedestrian access to the bridge. We strongly object to these two options, and would support instead any of the other options indicated earlier in the document. Mercy Corps has currently chosen to configure its property with a parking lot for guest and employee parking. However, as we grow, we have envisioned the area for building expansion. Our current program focuses on training and engagement with our local community. These programs are typically held at night. The current parking configuration provides a sense of security to those program participants, as we have access to limited safe parking close to the building and nearby street parking is extremely limited. Our concerns are not limited to our clients' and employees' use of the full area of the parking lot. The land itself is valuable to Mercy Corps, providing an option to expand our building into that area as we continue to grow.	We urge you to pursue pedestrian access options for the new Burnside Bridge that will not encroach on Mercy Corps' property. Dear Burnside Bridge Design Team: As we discussed, attached is a letter expressing Mercy Corps' concerns about access options for the new Burnside Bridge. Please don't hesitate to let us know if you wish to discuss further.	Comment acknowledged. Steve Drahota
98973	Comment noted	Hugh Donnelly	Thank you.	Comment acknowledged.	Shane Phelps
98974	Section 4(f)	ODOT - Oregon Department of Transportation (Region 1), State Historic Preservation Office (SHPO), Kurt W Roedel	Thank you for the opportunity to provide comments on the draft Environmental Impact Statement. The Oregon Historic Preservation Office (SHPO) is closely coordinating with cultural resources staff from the Oregon Department of Transportation (ODOT), as well as the Federal Highway Administration, regarding potential impacts to Section 106 and Section 4(f) resources. We look forward to further consultation as the project moves forward. Please contact Sarah Jalving, ODOT/SHPO Architectural Historian Liaison, at 503-508-0212, or Kurt Roedel, ODOT/SHPO Archaeology Liaison, 503-986-6571, if you have any questions.	Comment acknowledged. Thank you.	Jennifer Hughes
98975	Comment noted	Jessalynne Esham	As a life-long resident of the Pacific Northwest and a long-time resident of Portland, the development of earthquake ready bridges is a known concern for many who utilize them. With this said, I appreciate the hard work and thorough analysis that was put into the development of the Earthquake Ready Burnside Bridge Project.	Comment acknowledged.	Shane Phelps

Comment ID	Topic	Comment By	Comment	Response	Response By
98976	Project Timeline	Jessalynne Esham	The threat of the Cascadia Subduction Zone earthquake has been present for a long while, and the rebuilding and/or retrofitting projects for the bridges in the Portland metro area are a bit overdue, so I am sure many people are eager to see the beginning of the project come sooner rather than later, myself being one of them.	Comment acknowledged.	Shane Phelps
98977	Wetlands and Waters	Jessalynne Esham	The analysis of the contributing impervious area (CIS) as referenced by Section 3.14.1 on page 3-172 of the DEIS discusses the creation of the CIA by alternatives as seen fit, or as necessary. I feel like there is a high likelihood of the proposed alternatives resulting in a change of the CIA ; the pre-emptive acknowledgement of this possibility is wonderful and encouraging that mitigation practices will be ongoing throughout planning and construction. The Willamette being an impaired body of water is highly concerning already, and then with the development of a bridge along and over the river can further exacerbate the poor water quality, so ideally this level of consideration is ideal.	Comment acknowledged.	Cory Gieseke
98978	Stormwater	Jessalynne Esham	Also noteworthy in the same section is the use of GIS data and topographic information that already exists, as well as the on-the-ground verification of the geospatial data of pre-existing stormwater management infrastructure. Portland has unique topography along the Willamette as is, but with the added urbanization and changes in infrastructure around the Burnside Bridge over the years, a change of this magnitude should be reviewed exhaustively. Ensuring that the data that is being modelled off of is accurate and up to date is reassuring to the community with such a large project that can affect our day to day lives in such a big way.	Comment acknowledged.	Cory Gieseke
98979	Vegetation, Wildlife and Aquatic Resources	Jessalynne Esham	With all of this said however, I am mildly concerned about the fact that potential stormwater impacts downstream along the Willamette outside of the API have not been fully addressed. I do see it noted that a consultation with the National Marine Fisheries Service will be conducted at a later time. I do hope that the consultation goes well and some plans for minimizing the runoff will be discussed and implemented during construction. The preservation of the Willamette and its inhabitants even further away from the API should be considered in further plans for minimization and mitigation practices.	Comment acknowledged. FHWA has consulted with NOAA Fisheries under Section 7 of the Endangered Species Act resulting in a Biological Opinion that was issued by NOAA Fisheries on July 13, 2021.	Rachel Barksdale
98980	Public Involvement	Jessalynne Esham	I appreciate the opportunity to submit my comment on this project as a citizen especially as it does directly impact myself and many Oregonians. I feel that it is incredibly important to maintain the connection with communities and their members with projects of this magnitude, especially in times such as these where we are faced with an additional barrier in terms of outreach and communication.	Comment acknowledged, thank you. We agree, community outreach and communication is important and will continue throughout the project.	Sabrina Robinson
98981-1	Air Quality	Andrew Rogers	<p>These comments directly relate to the potential for adverse air quality impacts and generally pertain to the Air Quality Technical Report (AQ Report) provided as an attachment to the draft environmental impact state (draft EIS).</p> <p>Section 4.6, "Oregon State Air Toxics Benchmarks" of the AQ Report, states that "Originally, the toxic benchmarks were set at a level representing the concentration at which an individual has a one in a million chance of developing cancer if exposed over a lifetime. However, it should be noted that DEQ is in the process of re-evaluating this approach and future benchmarks may not follow this principle."</p> <p>In November 2018, the Oregon Environmental Quality Commission adopted the Cleaner Air Oregon (CAO) rules to close the regulatory gaps found in the previous Oregon State Air Toxics program (Oregon Administrative Rule [OAR] Chapter 340, Division 246). As part of this rulemaking, a total of 633 toxic air contaminants (TACs) (OAR 340-245-8020) have been identified as compounds that have the potential to adversely impact human health for both short- and long-term exposure durations. Notably, the CAO program addresses short-term exposure to a multitude of TACs, including formaldehyde, benzene, acetaldehyde, naphthalene, and 1,3-butadiene, which are compounds identified as mobile source air toxics (MSATs) in section 4.4 of the AQ Report. Each of these compounds has adverse human health risks attributed to short-term exposure (i.e., 24-72 hours), and have a quantified acute risk-based concentration (OAR 340-245-8040).</p>	Comment acknowledged. No change. The AQ Tech report provides the reasoning for why FHWA/ODOT qualitatively assessed MSATs and the limitations around estimating MSATs using current tools. There is also no regulatory requirement to analyze VOCs and NO2 since the project is in an area that is in attainment for all criteria pollutants. Therefore, these emissions estimates were not conducted for the project.	Scott Noel

Comment ID	Topic	Comment By	Comment	Response	Response By
98981-2	Air Quality	Andrew Rogers	<p>(continued from 98981-2) As a result of the CAO program, have there been any attempts to characterize and quantify acute non-cancer risk from the proposed increased vehicle traffic? Although the proposed Burnside bridge seismic upgrade project does not technically fall under the jurisdiction of the CAO program, in light of the increased public awareness of air quality since the commencement of the CAO program, identifying any potential acute health hazards is important.</p> <p>Section 7.5 of the AQ Report states: "Emissions will be produced in the construction of this Project from heavy equipment and vehicle travel to and from the site, traffic delays due to rerouting, as well as from fugitive sources." It is unclear from the contents of the AQ Report if the increase in traffic delays would result in additional MSATS, volatile organic compounds (VOCs), or nitrogen dioxides (NO2) in the area of potential impact (API) as identified in Figure 1. Have any analyses been conducted to characterize the potential for adverse local impacts in the API from the increased traffic delays?</p> <p>Hello,</p>	<p>Comment acknowledged. No change. The AQ Tech report provides the reasoning for why FHWA/ODOT qualitatively assessed MSATs and the limitations around estimating MSATs using current tools. There is also no regulatory requirement to analyze VOCs and NO2 since the project is in an area that is in attainment for all criteria pollutants. Therefore, these emissions estimates were not conducted for the project.</p>	Scott Noel
98982	Comment noted	Ryan Mckinnon	<p>I am emailing today to submit a comment letter for the Earthquake Ready Burnside Bridge Draft Environmental Impact Statement. Attached is the comment letter in a Microsoft Word document, please let me know if there is a preferred document type for submissions.</p> <p>Thank you for your time,</p>	Comment acknowledged.	Shane Phelps
98983	Comment noted	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>Please accept this attached letter as substantive comments on the EQRBB DEIS from the City of Portland Bicycle Advisory Committee and Pedestrian Advisory Committee. Their comments do not necessarily reflect those of the City of Portland.</p>	Comment acknowledged.	Shane Phelps
98984	Comment noted	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>The City of Portland's (Oregon) Bicycle and Pedestrian Advisory Committees (BAC/PAC) are pleased to submit this letter in response to the Earthquake Ready Burnside Bridge Draft Environmental Impact Statement (DEIS).</p>	Comment acknowledged.	Shane Phelps
98985	Purpose and Need	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>There is much that we support about the project, including the need for a seismically resilient crossing of the Willamette River in Downtown.</p>	Comment acknowledged.	Shane Phelps
98986	Sustainability and Climate Change	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>In particular, we believe that an investment of this scale should do more to meet adopted city, county and regional goals than merely "not directly affect long-term transportation greenhouse gas (GHG) emissions"¹; it should—and must—play a part in reducing them.</p> <p>There are three main areas where we believe the project could do more, while still meeting the Purpose and Need for the Project. These are: allocation of space on the bridge; connections to the pedestrian and bicycle network at each end of the bridge; and provisions for pedestrian and bicycle access during construction.</p>	Comment acknowledged.	Kelly Carini

Comment ID	Topic	Comment By	Comment	Response	Response By
98987-1	Comment noted	Travis Hood	<p>Overall, I am convinced of the need of a seismically resistant bridge spanning the Willamette River in downtown Portland. The draft EIS I feel adequately addresses why there exists a purpose and need for such a bridge. The draft EIS addresses other important issues regarding impacts to important environmental resources; however, I also feel the draft EIS lacks one important impact that should be considered in regards to the Burnside Bridge project.</p> <p>In the draft EIS many important issues were addressed, especially in regards to resources and the environment. The draft EIS addresses the very real possibility of the dangers of the Cascadia Subduction Zone (CSZ) earthquake, and the potential of not having bridges withstand it under the no action alternative, resulting in the inability for emergency responders to be unable to help people stranded across the river. Businesses would be impacted, TriMet transit service would face an almost total stop of service within the central city area, debris from bridges would block the railway and disrupt bicycle and pedestrian access on both sides of the river. (continued in 98987-1)</p>	Comment acknowledged.	Shane Phelps
98987-2	Comment noted	Travis Hood	<p>(continued from 98987-2)</p> <p>The draft EIS then goes on to illustrate how the build alternatives for the Burnside Bridge would offer a bridge that could withstand the CSZ earthquake event, allowing vital supplies, emergency responders, and supplies to economy moving, a way to cross the Willamette River. These facts alone are enough to convince me of the need to construct a build alternative for the Burnside Bridge. The no action alternative is quite obviously a shortsighted choice.</p> <p>As a person concerned with natural spaces and the environment, I am also pleased that the draft EIS analyzed natural resources, like parks, recreation, and open spaces. The draft EIS clearly identifies parks and recreation resources that would be impacted by the construction of a build alternative and mitigations for construction, including returning parks to preconstruction condition. I am particularly pleased to see that the preferred alternative includes opening up space in Waterfront Park. This is very important to help keep Portland green and for giving city dwelling people an outlet for exercise, which is important in these times of social distancing.</p> <p>Allocation of space on the bridge</p>	Comment acknowledged.	Shane Phelps
98988	Transportation - Long term bike, ped & ADA	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>The BAC/PAC welcomes the increased space for people on bikes, on foot or rolling at the midspan of the short span/long span options. Existing 5.5' wide bike lanes would increase to 8' wide; 7.3' wide sidewalks would increase to 8' wide. There would be a 2.5' wide buffer between bicycles and pedestrians. Active transportation lanes would also be protected from traffic, with room for barriers. This represents a substantial improvement over the status quo, and indeed over other bridges in the city.</p>	Comment acknowledged. The County commits to continuing coordination on the final cross section and active transportation space with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
98989	Transportation - Long term bike, ped & ADA	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>We are, however, concerned that the generous space at the midspan is reduced at the east and west approaches, where the proposed cross sections provide less room for active transportation than currently exists. This is likely to be a particular problem at the Portland Rescue Mission, where sidewalks are well used by people utilizing the social services provided.</p>	Comment acknowledged. The bridge cross-sections at the midspan and both approaches balanced many demands. The final bridge width and allocation of space will be determined in the final design phase and this feedback will be considered. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase."	Lewis Kelley
98990	Social and Neighborhood Resources	Ryan Mckinnon	<p>Page 3-117 of chapter 3 states "None of the replacement alternatives would close or obstruct the PRM access doors on Burnside Street." But in the Executive Summary page S-24 it states that only the retrofit would cause the PRM to close for a few months. While this states what alternative would cause an issue with PRM, adding in that the preferred alternative would allow the PRM to stay open for the construction of the new bridge would reinforce the fact that hopefully the PRM would not close.</p>	Addressed in SDEIS: the Refined Long-span Alternative would not displace the PRM or Mercy Corps or any other social service agencies.	Sabrina Robinson

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98991	Transportation - Long term traffic, freight & transit	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>This reduced width at the approaches appears to be for the purpose of providing a) turning lanes and b) wider vehicular lanes than currently exist. The provision of wider lanes than currently exist is of particular concern, given that speeding is already a significant issue on the bridge. According to the National Association of City Transportation Officials (NACTO)—of which both the City of Portland and TriMet are a member—10 feet should be considered adequate:</p> <p>Lane width should be considered within the overall assemblage of the street. Travel lane widths of 10 feet generally provide adequate safety in urban settings while discouraging speeding. Cities may choose to use 11-foot lanes on designated truck and bus routes (one 11-foot lane per direction) or adjacent to lanes in the opposing direction.³</p> <p>Given that there are buffers proposed at the center of the bridge and at the edge, it is unclear why wider lanes would be needed.</p>	<p>Comment acknowledged. The lane configuration will be determined in the Final Design phase. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.</p>	Adrian Witte
98992-1	Environmental Justice and Equity	Travis Hood	<p>One area of concern that I have not seen adequately addressed in the draft EIS is the population of people without homes who use the area beneath and around the bridge to live. The construction of a build alternatives, which include the destruction of the existing bridge, would displace this population of people, yet I see nothing in the analysis that is concerned with the displacement of these individuals. I know it can be tempting for officials to overlook this population of vulnerable peoples, but in this day-and-age it seems unconscionable to not even consider the impacts that this project would have on a sizable population of vulnerable people. Perhaps this can be addressed by the opening of even more shelters in the area, whether temporary or permanent, for this population of people. Regardless, to simply ignore the issue seems to me to be unacceptable.</p>	<p>These issues are addressed in detail in the EJ Technical Report. The DEIS EJ Chapter and SDEIS also address these issues. The project team has conducted extensive and ongoing outreach with social service providers in the area that directly serve homeless and houseless community members in the project area to gather information on the approximate number of people typically staying under the bridge as well as the potential impact of the bridge on these populations. We've also analyzed Multnomah County Point In Time data to try to understand the overall population of homeless and/or houseless individuals within the Project Area at any given time.</p> <p>(continued in 98992-1)</p>	Eduardo Montejo
98992-2	Environmental Justice and Equity	Travis Hood	<p>One area of concern that I have not seen adequately addressed in the draft EIS is the population of people without homes who use the area beneath and around the bridge to live. The construction of a build alternatives, which include the destruction of the existing bridge, would displace this population of people, yet I see nothing in the analysis that is concerned with the displacement of these individuals. I know it can be tempting for officials to overlook this population of vulnerable peoples, but in this day-and-age it seems unconscionable to not even consider the impacts that this project would have on a sizable population of vulnerable people. Perhaps this can be addressed by the opening of even more shelters in the area, whether temporary or permanent, for this population of people. Regardless, to simply ignore the issue seems to me to be unacceptable.</p>	<p>(continued from 98992-2)</p> <p>The number of people living under the bridge is unknown, but social service providers have shared that the number at any given time is low, often in the single digits. Providers also shared that the individuals who stay under the bridge are typically transient and do not stay under the bridge for extended periods of time. The under bridge area would not be accessible during construction, but the Preferred Alternative and mitigation strategy would ensure that homeless and/or houseless individuals who stay under the bridge would be able to access social services during the construction period. Of important note, Night Strike - the weekly feeding that happens Thursday Nights under the bridge - has been coordinating closely with the project team and have shared that they will move operations to a nearby bridge such as the Steel or Morrison Bridge. They also shared that their clientele is very resilient and should not be significantly impacted by the moving of these services.</p> <p>The other important impact to clarify is the removal of columns under the bridge under the Preferred Alternative. Based on input from the community and social service providers, as well as our own analysis, we believe that the removal of columns under the bridge will actually improve condition for all users, including homeless and houseless populations. Fewer columns will result in more open space, improved lighting, and visibility under the bridge to create a safer environmental for all, particularly for organizations like Night Strike that provide direct services to vulnerable populations in this area.</p>	Eduardo Montejo

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98993	Transportation - Long term traffic, freight & transit	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>Most significantly, we are concerned that the project makes no active provision for transit in the westbound direction. In February 2020 the Portland City Council voted unanimously to adopt the Rose Lane Project Report, which identified the westbound Burnside Bridge as a "Potential Future Corridor [for a bus lane] in Partnership with Other Agencies"⁴. The report identified a Bus and Turn (BAT) lane on NE Couch between MLK and NE 12th (leading to the Burnside Bridge) as a Phase 1 project. The City is currently doing public engagement on this. As noted in the Transportation Technical Report⁵, the Rose Lane Project Report and its recommendations are Reasonably Foreseeable Future Actions under NEPA and it "is likely that the majority of the proposed Rose Lane network will be implemented by the future year date."⁶ Given this, it is unclear why the project is only providing provision for a westbound transit lane, rather than including it from the start. Providing a bus lane on the replacement bridge, from the day that it opens, will help make lines 12, 19 and 20 faster and more reliable, meeting many adopted City and County climate goals. A bus lane in the westbound direction would also better help the project achieve its goal of seismic resilience. If other Willamette River bridges are unusable after an earthquake, numerous bus routes will need to be re-routed to the Burnside Bridge. With fewer crossings over the river available, high capacity transit such as buses will need to play a greater role in getting key workers to and from their jobs.</p> <p>There will never be a better time to add a westbound bus lane to the Burnside Bridge than when it is being reconstructed. After four and a half years without a bridge, drivers will have adjusted to the loss of the existing route. If the bridge reopens with four general purpose vehicular lanes, the 'loss' of a lane for vehicular traffic at an unspecified time in the future will be felt more acutely than if the bridge reopens with three lanes.</p>	<p>Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes two General Purpose lanes in the Westbound direction, and a combination of 1 General Purpose plus 1 Bus Only lane in the Eastbound direction. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.</p>	Adrian Witte
98994	Environmental Justice and Equity	Millissa Ravenblade	<p>The failure in the quantitative data for population without homes is less accuracy due to participation.</p>	<p>Thank you for your comment. This topic is addressed in the EJ Technical Report and DEIS Chapter 3. Yes, the Point in Time Report methodology and discussions with homeless social service providers within the project area confirm that accurate counts are challenging due to a lack of participation. Many of these community members are also transient, making it difficult to know precisely how many people live in a particular area during a particular point in time.</p>	Eduardo Montejo
98995	Active Transportation Access Options	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>Connections to the pedestrian and bicycle network at each end of the bridge</p> <p>The BAC/PAC welcome improvements in access between the bridge and the pedestrian and bicycle network at either end of the bridge, identified in the Active Transportation Memorandum.</p>	<p>Comment acknowledged.</p>	Steve Drahota
98996	Active Transportation Access Options	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>At the east side of the bridge, all options represent an improvement over existing conditions. We are glad that earlier options that only provided access to one side of the bridge have been dismissed.</p>	<p>Comment acknowledged.</p>	Steve Drahota
98997	Active Transportation Access Options	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>We are concerned, however, that only options with an elevator or ramps are being considered⁷. Given the significant height difference between the Esplanade and the bridge deck, elevators would be very helpful for people with mobility issues, and as such we do not want to see the project rely on ramps alone. However, ramps better serve people who are cycling, and who may not wish to wait for an elevator. Furthermore, other Portland area bridges with elevators, such as the Darlene Hooley Bridge, have seen extended closure of their elevators—and it is hard to imagine that an elevator would be in service immediately after a major earthquake.</p>	<p>Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.</p>	Steve Drahota
98998	Transportation - Short term bike, ped & ADA	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>We are particularly concerned about the 1.5 years of cumulative closure of the Eastbank Esplanade (for the long span alternative) or 2.5 to 3 years for all other alternatives.⁹ This is in sharp contrast to I-5, where work is described as being "generally... limited to night work during the week and pre-determined, limited weekends."¹⁰ Closures of a major piece of Portland's active transportation network should not be taken any more lightly than closing more automobile focused pieces of the road network.</p>	<p>Comment acknowledged. The final construction approach will be finalized during the Final Design Phase with the intent to minimize the extent of closures where possible. The County commits to continuing coordination with the City in advance of, as well as during, the Final Design phase. For further details, please see the Revised Constructability Technical Report included with the SDEIS.</p>	Lewis Kelley

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98999	Transportation - Short term bike, ped & ADA	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	When closures to the esplanade do need to occur, detours for people walking, rolling or cycling should be short, direct and of as high a quality as possible. Simply directing people to the existing MLK/Grand Corridor or 7th/Blumenauer Bridge would create a significant travel disruption, on corridors with a much higher stress level than the Esplanade.	Addressed in the FEIS Mitigation section. A list of mitigations has been developed in coordination with the City, TriMet, ODOT and other partners that includes active transportation detours and improvements along active transportation routes to increase comfort and safety. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99000	Transportation - Short term bike, ped & ADA	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	The project should provide mitigation for closures, such as building out the bicycle network on SE Water Ave11 and SE/NE 7th Ave12, as planned by Central City in Motion.	Addressed in FEIS. A list of mitigations has been developed in coordination with the City, TriMet, ODOT and other partners that includes active transportation detours and improvements along active transportation routes to increase comfort and safety. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99001	Transportation - Short term bike, ped & ADA	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	The project team should also investigate whether all or part of the ODOT access road between I-5 and the UPRR tracks could be used as an active transportation detour, in addition to its planned use as construction road 13.	Comment acknowledged. The ODOT access road that is parallel to I-5 and the railroad will be used for access during construction and used to bring materials and equipment into the construction site. The County commits to continuing this coordination with ODOT in advance of, as well as during, the Final Design phase.	Lewis Kelley
99002	Environmental Justice and Equity	Ryan Mckinnon	<p>Besides that, the executive summary does not talk about other adverse impacts to the EJ populations on any of the other alternatives. Or ones that would happen during any of the alternatives, such as the displacement of the homeless. Adding in a bit more information in this section might allow more support for the mitigation efforts this project has talked about and thought about for the general populace so they do not have to spend time they may or may not have searching the whole EIS.</p> <p>The project's section on Environmental Justice does a great job at explaining the impacts to the effected populations and the differences between the chosen alternatives, such as the maps showing the pathing of walking and bicycle paths with and without a temporary bridge...Overall, I think the Environmental Justice analysis for every alternative mentioned in the EIS was sound and fit the purpose and the need for the project. It just seemed like the executive summary was a little vague at pointing out the parts of the analysis that could be highlighted to increase public knowledge of what the most probable impacts and benefits would be.</p>	<p>The EJ issues are documented in detail in the EQRB EJ Technical Report and DEIS Chapter 3.</p> <p>Please note that EJ is only one of several environmental resource topics and that the analysis is thoroughly documented in the EJ Technical Report. Therefore, the DEIS Executive Summary is intentionally brief.</p> <p>The project team has also developed resource-specific graphical summaries as a way of sharing more digestible information with the public. You can find the EJ summary sheet here: https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/TechReportSum_ej.pdf</p> <p>This summary does not go into a detailed discussion regarding the other alternatives and potential impacts to EJ populations, but that information is also published publicly in the EIS and Technical Reports on the website: https://www.multco.us/earthquake-ready-burnside-bridge/draft-environmental-impact-statement</p>	Eduardo Montejo
99003	Purpose and Need	John Weigant	<p>An earthquake is inevitable, but the date and magnitude are uncertain. The costs to stabilize the bridge will be substantial and now, and even then no bridge may survive. Or it might not be a "big one" and several bridges will survive.</p> <p>Climate change is inevitable, but the date for zero carbon is 2050, and all of society must change, and the costs of zero carbon will be much more than substantial. So we should spend our money abating climate change.</p> <p>What happens if there's an earthquake and all bridges fall? It will hugely cut transportation, a climate change driver. In my mind, we should spend the money to cut the bigger problem, climate change.</p>	Comment acknowledged. Having a seismically resilient bridge does not displace the societal need to also address climate change.	Shane Phelps
99004	Public Involvement	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	<p>Conclusion</p> <p>The BAC/PAC would like to thank the project team for briefing us multiple times in advance of the release of the DEIS. We hope and expect that this engagement will continue as the project moves into design.</p>	Comment acknowledged, thank you. Outreach and engagement efforts will continue throughout the duration of the project.	Sabrina Robinson
99005	Comment noted	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC), Roger Geller, Ally Holmqvist, Teil Jackson, Rebecca Sanders, David Stein	There are many positive aspects to the project, and we are confident that the issues raised in this letter can, and will, be addressed.	Comment acknowledged.	Shane Phelps
99006	Transportation - Short term traffic, freight & transit	Ryan Mckinnon	A map for suspected detours for the auto transit (such as cars, buses, and freight) would have been a great help in addition to the tables about increased travel times.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified detour routes and potential transit mitigations. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Adrian Witte

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			This letter is being written in response to the Water Quality impact analysis of the Draft Environmental Impact Statement (DEIS) for the proposed Earthquake Ready Burnside Bridge (ERBB). I am a Portland State University Environmental Science & Management undergraduate student. The primary reason I chose to reflect on this specific section of the DEIS is because I have a background in stormwater quality management. I feel like it is my duty as Portland Native and I have some ground as a stormwater quality professional to comment on the section of Water Quality impact analysis. That being said, I am no expert and am writing to you as interested citizen, student, and professional.		
99007	Comment noted	Betty Lee		Comment acknowledged.	Shane Phelps
99008	Comment noted	Jordan Flythe	I think the bridge options that we have look great!	Comment Acknowledged.	Josh Carlson
			In chapter 3 section 3.5.2 (long term impacts) and 3.5.3 (short term impacts) these sections do not overlap in how the economics would be affected. In section 3.5.2 it focuses on monetary value in avoided accidents (table 3.5-1 on page 3-67) while section 3.5.3 focuses on many more factors such as business revenue, employment income, etc. (table 3.5-2 and table 3.5-3 on pages 3-69 and 3-70). My biggest worry is why is the long-term effect on employment or business revenue not mentioned. Was it not feasible to research this or was it simply not thought about when making this section?	Analysis of short-term impacts focuses on disruptions caused by construction and effects of construction expenditures. The former captures the implications of disruptions to traffic flow, access to buildings and other destinations while the latter quantifies creation of jobs and income from construction expenditures. Analysis of long-term impacts focuses on disruptions and other effects that can be expected to persist after construction is finished. This includes impacts on crash profile in the Bridge vicinity and some business displacements. While some business displacements/relocations were identified, it is not anticipated that this in itself will lead to employment and income impacts. The affected businesses will incur some relocation costs and this issue has been acknowledged.	
99009	Economics	Ryan Mckinnon			Ewa Tomaszewska
99010	Social and Neighborhood Resources	Jordan Flythe	I believe the priorities when choosing what type of bridge to build should be preserving the skate park, creating and prioritizing physically separated bike lanes, and preserving the view of the old town sign.	Comment acknowledged. Addressed in SDEIS: discusses potential impacts from the refined alternative design to the skatepark, bicycle lanes and views. The refined alternative will preserve the skate park.	Sabrina Robinson
			This project has the heaviest disadvantages populations are the low-come populations included those with or without houses with annual incomes \$25,750; however, this analysis raised it to account for possible future inflation. The population without home was represented by 30.8% of expected populations in Multnomah County. Regardless of alternative actions this populations without homes would spread future away from social communities during land acquisition for bridge easement. The alternative no temporary bridge alternative would give this populations more time to move away from needed resources. The (EQRB) has been extensive mitigations for long term survival of this social economic, medical, industrial, public, and governmental services, The failure in the quantitative data for population without homes is less accuracy due to participation. As an Oregonian, travelling over the Burnside Bridge is both breathe taking and cramped. Under the temporary bridge alternative consider use of land acquisitions could be used for temporary and/or acquisition extra land for without house populations shifts in region. This could lead to less disruption neighboring counties social economic, public, and state services. For the EQRB project met the federal requirements defined by EO 12898 as required as of 2012; the population group will more help under all alternative. The mitigations to EQRB approach to direct and indirect impact without house populations were vague on transition land. The EO 12898 helps illuminate the disadvantage groups but does not require Federal Highway Administration mitigate for public lands currently being used by this population group will be acquisition for the EQRB project.	These comments are addressed in the EJ Technical Report and DEIS Chapter 3. The Preferred Long-Span Replacement Alternative will avoid the most significant impacts to Environmental Justice populations by maintaining pedestrian access to Portland Rescue Mission during the construction period. Multnomah County is also committed to continuing coordination with service providers throughout the design and construction periods to mitigate construction-related temporary displacements of homeless and/or houseless individuals via transit assistance, construction notices, and relocation support.	
99011	Environmental Justice and Equity	Milissa Ravenblade			Eduardo Montejo
99012	Vegetation, Wildlife and Aquatic Resources	Betty Lee	Next, the Endangered Species Act was momentarily mentioned when confronting the potential for stormwater impacts to the Willamette River downstream from the project area. But it was not evident why consultation with the National Marine Fisheries Service was required for the stormwater analysis. If there are listed species and/or critical habitat downstream that may be affected by the proposed project, please clarify it in this section or refer the reader to section(s) that address the rational.	Section 5.3.3 of the Vegetation, Wildlife, and Aquatic Species Technical Report lists the species of fish in the API, which stretches approximately 15,000 feet downstream from the Bridge. Consultation with NMFS was required due to ESA-listed species present in the API, which is discussed in the Vegetation, Wildlife, and Aquatic Species Technical Report.	Rachel Barksdale
99013	Wetlands and Waters	Betty Lee	Furthermore, I was left wondering what other biological and chemical pollutants are of concern in the Willamette River that does not have approved total maximum daily loads (TMDL) since the expert team only list the pollutants that currently have approved TMDL.	Comment acknowledged. The extent of types of pollutants is not fully known at this time. Additional hazardous materials investigations will occur during final design.	Greg Mazer

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99014	Stormwater	Betty Lee	<p>Then, it was listed a few times in the Water Quality analysis that stormwater is managed by the "City of Portland or Multnomah County". Please clarify which entity oversees stormwater management in the project area. And lastly, although it is greatly appreciated that the Post CSZ Earthquake impacts were analyzed, it is concerning there is no outlook to update the existing drainage infrastructure receiving the stormwater runoff from the proposed ERBB addressed in this section. Mitigation through water quality treatment and surface waters was heavily stressed in this analysis. It would be a disservice to the project if the discharge receiving systems cannot withstand an event of 8+ CSZ earthquake. I understand the purpose of the ERBB is for it to be the bridge that withstand the CSZ earthquake so it can be operational for emergency travel from west Portland to east Portland. However, this shortcoming should not be overlooked. This period is an ideal time to address the water quality treatment receiving facilities do not cause any negative water quality concerns in the event of an 8+ CSZ earthquake. Overall, a few concerning details can be clarified and addressed.</p> <p>In summary, the DEIS team prepared a water quality impact assessment that touched on many essential components. Yet, there are improvements that can be made to produce an even stronger evaluation.</p>	<p>Addressed in the DEIS errata Section 3.14.1. Stormwater is managed by both the City and the County within the Project Area.</p> <p>The project will be built to meet current design standards. The drainage infrastructure that would not be able to withstand an earthquake is existing and outside of the Project. The Project will not be reconstructing drainage infrastructure outside of the Project Area.</p>	Cory Gieseke
99015	Preferred Alternative	Nicole Underwood	<p>I support the Long-span Approach with No Temporary Bridge alternative as presented in the Earthquake Ready Burnside Bridge Draft Environmental Impact Statement as I think it has the greatest benefit with the least negative impacts.</p> <p>Nevertheless, there were a few points that could be improved upon. As an interested party, I would like to be able to assess the published sources and databases used to characterize the existing conditions. I suggest providing footnotes to the resources in order to alleviate anyone's curiosity.</p>	Comment acknowledged.	Shane Phelps
99016	Wetlands and Waters	Betty Lee	<p>Based on my evaluation, the expert team met many crucial points in an impact assessment analyzing water quality. Some of these points includes identifying contributing impervious areas (CIA) as the source of impact, identifying relevant federal, state, and local standards pertaining to water quality, informing readers of the sources used to characterize existing conditions, and writing out predicted changes under each alternative using both quantitative and qualitative descriptions, while illustrating mapping models and tables to express these predictions. Not only did the DESI address direct and indirect impacts, but there were also temporary and post Cascadia Subduction Zone (CSZ) earthquake impacts that were attended to, as well as a subsection briefly appraising each alternative's impacts. Table 3.14-2 meticulously compared the existing conditions to prediction conditions under each alternative regarding net increase in impervious surface, treated, and untreated acres. All in all, I give praise to the expert team for touching on many key components of an impact assessment involving water quality.</p>	Sources are cited in text and included in the reference section of the Technical Reports - please refer to the Wetland and Waters Technical Report.	Greg Mazer
99017	Comment noted	Betty Lee	<p>I do not think building a temporary bridge that would have limited capacity and extend the build timeline out 2 years is worth the limited benefits.</p>	Comment acknowledged.	Shane Phelps
99018	Preferred Alternative	Nicole Underwood	<p>However, I think that this preferred alternative needs further analysis (and subsequent mitigation) of the impacts that this alternative will have on E.J.-designated populations. As noted in the EIS, E.J. populations (along with the general public) will need access to alternative transportation options during this time period. The EIS further noted mitigation measures could include directly subsidized transit passes to impacted E.J. communities and increasing frequency of transit service targeting these populations both of which are good ideas.</p>	Comment acknowledged. The Preferred Alternative does not include construction of a temporary bridge.	Shane Phelps
99019	Transportation - Short term traffic, freight & transit	Nicole Underwood	<p>However, I think that this preferred alternative needs further analysis (and subsequent mitigation) of the impacts that this alternative will have on E.J.-designated populations. As noted in the EIS, E.J. populations (along with the general public) will need access to alternative transportation options during this time period. The EIS further noted mitigation measures could include directly subsidized transit passes to impacted E.J. communities and increasing frequency of transit service targeting these populations both of which are good ideas.</p>	Addressed in FEIS Mitigation section. A list of mitigations has been developed in coordination with the City, TriMet, ODOT and other partners that includes active transportation detours and improvements along active transportation routes to increase comfort and safety. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte

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99020	Environmental Justice and Equity	Nicole Underwood	<p>However, the DEIS should reexamine its conclusion that EJ populations will not experience disproportionately high adverse impacts from weekend and evening lane closures on I-5 and I-84. The DEIS states that "such lane closures are not anticipated to result in disproportionately high and adverse effects on EJ populations compared to impacts on Burnside Bridge users as a whole. In addition, construction trucks would be traveling to and from the site throughout the construction phase, contributing to the traffic delays. These traffic delays are not considered disproportionately high and adverse effects on EJ populations." While this may be true, a more detailed analysis of the types of jobs that low-income and minority populations hold as well as locations of those jobs would provide a more comprehensive picture of impacts. Low-income and/or minority populations may be less likely to work at 9 am to 5 pm Monday-Friday jobs. Weekend and evening lane closures of I-5 and I-84 could disproportionately impact these populations if they have to travel to jobs during these times whereas other populations may be able to change travel plans more easily. This should be considered and mitigated for including increasing transit service during these times specifically, ensuring that delays do not become overly burdensome.</p>	<p>Thank you very much for your comment and we appreciate your thoughtful considerations.</p> <p>Mitigation strategies to address weekend/evening closures on I-84 are addressed in the FEIS Mitigation chapter. Determining the demographic composition of who is travelling over the Burnside Bridge at different times/periods is very difficult to ascertain without conducting some kind of statistically significant sampling of travelers over the bridge for an appropriate length of time. The technical analysis did not do this kind of large-scale sampling. As a general practice, EJ analyses for similar projects rely on Census-based geographic information within the Project Area to derive estimates on potential EJ impacts. Travel demand modeling has also been done to forecast traffic impacts, although linking anticipated impacts to specific EJ populations has not been done.</p> <p>For those reasons, the mitigation strategy recommends free or subsidized transit passes to affected users. The Preferred Alternative also avoids the most significant impacts to pedestrian access throughout the construction period, and people will be able to access the Portland Rescue Mission on foot or by bike throughout the building of the bridge.</p>	Eduardo Montejo
99021	Environmental Justice and Equity	Nicole Underwood	<p>would also be beneficial to further consider impacts and mitigation measures for EJ-owned businesses which may also suffer disproportionate impacts. For example, Old Town/Chinatown (OT/CT) has a number of minority-owned businesses, and closing this bridge for 4 years could divert business to other areas. In the case of OTCT, minority business owners who are already struggling could be further negatively impacted if the construction further deters people from the district. This area already has challenges associated with cleanliness and safety and a disproportionately high amount of the houseless population. While the EIS does mention general business impacts and mitigations, applying an EJ lens to business impacts may reveal further important considerations for targeted mitigation strategies that benefit EJ populations.</p>	<p>Thank you for your comment. The County is committed to continued coordination with business associations and conducting direct outreach to businesses in the area through the design and construction phases to understand the specific business impacts to minorities in Old Town/Chinatown.</p>	Eduardo Montejo
99022	Transportation - Long term bike, ped & ADA	Jordan Flythe	<p>I believe the priorities when choosing what type of bridge to build should be...creating and prioritizing physically separated bike lanes</p>	<p>Comment acknowledged.</p>	Lewis Kelley
99023	Visual and Aesthetic Resources	Jordan Flythe	<p>I believe the priorities when choosing what type of bridge to build should be...preserving the view of the old town sign.</p>	<p>Comment acknowledged.</p>	Josh Carlson
99024	Comment noted	Metro, Elissa Gertler, Alex Oreschak	<p>Thank you for the opportunity to review and comment on the Earthquake Ready Burnside Bridge project's Draft Environmental Impact Statement (EIS). We congratulate Multnomah County and the Federal Highway Administration on completion of this well-organized document that strikes a balance between accessibility and thoroughness. Construction of this project is important for the long-term success of our region and once completed, it will provide a critical link for emergency response, rescue, evacuation, and goods movement in the event of a major earthquake.</p>	<p>Comment acknowledged.</p>	Shane Phelps
99025	Preferred Alternative	Metro, Elissa Gertler, Alex Oreschak	<p>This memo summarizes Metro's technical review of the Draft EIS and project documents. In general, Metro supports the project and the Preferred Alternative identified in the Draft EIS. We are pleased to provide additional comments on specific elements of the Draft EIS as described below.</p>	<p>Comment acknowledged.</p>	Shane Phelps

Comment ID	Topic	Comment By	Comment	Response	Response By
			<p>In particular, we would like to highlight comments related to temporary construction impacts.</p> <p>Temporary Construction Impacts</p> <p>Metro supports the recommendation of a full closure (no temporary bridge) in order to reduce the construction timeframe and minimize overall impacts. However, with a multi-year bridge closure, there is a clear need to thoughtfully develop mitigations in order to minimize negative impacts, particularly to transit and active transportation. Specifically, we support the following:</p> <ul style="list-style-type: none"> • Development of a detailed detour plan for pedestrians and bicyclists as part of the project. If this is already planned, it should be referenced within the EIS. In addition to wayfinding signage and traffic calming, suggest considering other treatments to enhance safety and minimize out of direction travel time, including adjustments to signal timing for green wave bicycle travel, pavement markings, temporary bikeways on NE MLK Jr. Boulevard and Grand Avenue, temporary bikeway and walkway on the ODOT maintenance road adjacent to I-5, early implementation of nearby Central City in Motion projects, enhanced existing bikeways, and additional pedestrian crossing treatments. • Additionally, if there is the possibility to increase the number, availability and access to bike share and scooter share, or provide free rides on streetcar or buses within the vicinity, these options could help shorten the travel distance for pedestrians. As much effort as possible should be made to minimize impact to people walking, bicycling and accessing transit. 		
99026	Transportation - Short term bike, ped & ADA	Metro, Elissa Gertler, Alex Oreschak		Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified detour routes and potential transit mitigations. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99027	Transportation - Short term bike, ped & ADA	Metro, Elissa Gertler, Alex Oreschak	Consider construction of permanent bicycle and pedestrian improvements as part of the mitigation effort, rather than as temporary facilities.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes and improvements along identified detour routes that would include both temporary and permanent improvements. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99028	Social and Neighborhood Resources	Metro, Elissa Gertler, Alex Oreschak	<ul style="list-style-type: none"> • To the extent possible, minimize extended closures of the Eastbank Esplanade, and ensure that either "Better Naito" or the Waterfront Park remain open and accessible with minimal impacts. There are already overcrowding issues on the west side of the waterfront during summer months, and these issues will be even more substantial during proposed temporary closures. Events such as Fleet Week, the Waterfront Blues Festival, and the Oregon Brewers Festival may result in even severe overcrowding when the Eastbank Esplanade is not available as an alternative route. 	Addressed in SDEIS: The Refined Alternative will minimize temporary closures as much as possible. Construction mitigation discussions will continue through final design.	Sabrina Robinson
99029	Transportation - Short term traffic, freight & transit	Metro, Elissa Gertler, Alex Oreschak	Consider temporary closure of the Steel Bridge to all vehicles except bus and light rail in order to mitigate significant anticipated delays, particularly if Lines 12, 19 and 20 are rerouted to the Steel Bridge. This should be studied closely in consideration with additional transit priority on the Broadway and Morrison bridges and approaches, in order to mitigate impacts from traffic diversion to those bridges. Additional consideration should be given to implementation of transit-only lanes connecting West Burnside Street to existing transit-only lanes on NW Everett Street, and to connecting the Rose Quarter Transit Center with existing transit-only lanes on NE Grand Avenue and NE MLK Jr. Boulevard.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified detour routes and potential transit mitigations. The County commits to continuing coordination on mitigations with the City and TriMet in advance of, as well as during, the Final Design phase.	Adrian Witte
99030	Cumulative Impacts	Metro, Elissa Gertler, Alex Oreschak	These mitigations would be particularly important in the event that the I-5 Rose Quarter project closures occur at the same time as the Burnside Bridge project construction is underway.	The project will continue coordinating with ODOT and other agencies on the timing of the two construction projects and decisions regarding appropriate mitigation based on that timing.	Shane Phelps
99031	Transportation - Long term traffic, freight & transit	Metro, Elissa Gertler, Alex Oreschak	<p>In particular, we would like to highlight comments related to the final configuration of the right-of-way under the replacement alternatives.</p> <p>Replacement Alternatives Right-of-Way</p> <ul style="list-style-type: none"> • For the replacement alternatives, Metro is supportive of the expanded sidewalk and sidewalk-level bikeways, as well as the eastbound transit-only lane, as illustrated on page S-11 of the Draft EIS. It is critically important to retain the eastbound transit-only lane in the final configuration, as this improvement provides travel time and reliability benefits to thousands of daily riders on Lines 12, 19 and 20. • Metro also supports design of the bridge to be streetcar ready, as noted on page S-9 of the Draft EIS, as well as future consideration of a westbound transit only lane on the Burnside Bridge, as described on page S-37 of the Draft EIS. 	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes two General Purpose lanes in the Westbound direction, and a combination of 1 General Purpose plus 1 Bus Only lane in the Eastbound direction. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
99033	Transportation - Long term bike, ped & ADA	Metro, Elissa Gertler, Alex Oreschak	Executive Summary Pg. S-11 For the replacement alternatives, Metro is supportive of the expanded sidewalks and sidewalk-level bikeways	Comment acknowledged.	Lewis Kelley

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99034	Transportation - Long term traffic, freight & transit	Metro, Elissa Gertler, Alex Oreschak	as well as the eastbound transit-only lane. It is critically important to retain the eastbound transit-only lane in the final configuration, as this improvement provides travel time and reliability benefits to thousands of daily riders on Lines 12, 19 and 20. Executive Summary Pg. S-37 Metro supports future consideration of a westbound transit only lane on the Burnside Bridge.	For the FEIS / ROD, the Preferred Alternative includes two General Purpose lanes in the Westbound direction, and a combination of 1 General Purpose plus 1 Bus Only lane in the Eastbound direction. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
99035	Transportation - Long term traffic, freight & transit	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-11, second bullet Clarify that total ridership for bus lines would double by 2045 compared to current ridership.	Comment acknowledged. Changes to the technical reports written for the DEIS were not revised as part of the FEIS. Where applicable, sections of the DEIS chapters were revised based on comments received during the DEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of FEIS errata. Edited the text to reflect the suggested clarification.	Lewis Kelley
99036	Transportation - Long term bike, ped & ADA	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-12: Option 2 Last sentence states that a south-side ramp would provide "more direct access for eastbound bicyclists and pedestrians". "Eastbound sounds like it applies to the pedestrians as well as cyclists; use "southside pedestrians" as used in the Option 3 description	Comment acknowledged. Changes to the technical reports written for the DEIS were not revised as part of the FEIS. Where applicable, sections of the DEIS chapters were revised based on comments received during the DEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of FEIS errata.	Lewis Kelley
99048	Comment noted	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Page 3-13 third paragraph Typo "adds f a mid-block crossing"	Revised in DEIS errata chapter of FEIS.	Shane Phelps
99049	Transportation - Short term bike, ped & ADA	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-17: second full paragraph (priority use of bridge) Suggest adding reference to bicycles for emergency response. Bicycles have proven to be very effective in emergency response, especially after earthquakes. Portland has staged mock response trials with bicycles.	Comment acknowledged. Changes to the technical reports written for the DEIS were not revised as part of the FEIS. Where applicable, sections of the DEIS chapters were revised based on comments received during the DEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of FEIS errata. Added a note about bicycles used for emergency response.	Lewis Kelley
99050	Transportation - Short term bike, ped & ADA	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-24 Suggest a less circuitous detour for bicycle and pedestrian users on the east side of the project area. Options include use of the ODOT maintenance road to connect more directly to the Steel Bridge lower deck, and/or temporary protected bike lanes NE Grand Avenue and NE MLK Jr. Boulevard. It appears that the maintenance road is identified currently as construction access Appendix G; consideration should be given as to whether bicycle and pedestrian access can coexist with construction access, or whether an alternative route for construction access could be identified. The project team might look to current WSDOT construction of SR-520 near Montlake Boulevard for an example of how bicycle and pedestrian access could be accommodated adjacent to construction access.	Addressed in FEIS Mitigation section. A list of mitigations has been developed in coordination with the City, TriMet, ODOT and other partners that includes active transportation detours and improvements along active transportation routes to increase comfort and safety. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99051	Transportation - Short term bike, ped & ADA	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-27 If SW Water Avenue and SW 3rd Avenue are utilized as part of the detour for bicycle users, the project should consider constructing Project 14 from Portland's Central City In Motion plan (SE Water / Stark / 3rd), at least north of SE Yamhill Street.	Addressed in FEIS Mitigation section. A list of mitigations has been developed in coordination with the City, TriMet, ODOT and other partners that includes active transportation detours and improvements along active transportation routes to increase comfort and safety. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99052	Transportation - Short term traffic, freight & transit	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-33 Last transit section It is surprising that transit ridership would drop with a temporary transit/bike/ped only bridge. It makes sense that congestion would cause the buses to be slower than in the no-build, but it would also seem that bus travel time compared to auto travel time would improve in this scenario since autos would need to detour. Seems bus would have a comparative advantage in this scenario.	Comment acknowledged. These results are drawn from Metro's regional travel demand model. There are a number of assumptions that may influence these results. It is noted that the report shows less ridership loss in this scenario than compared to a full closure.	Adrian Witte
99053	Social and Neighborhood Resources	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-34 bike and ped safety section There is potential for an increase in conflicts between people walking and people biking along "Better Naito" and the Waterfront Park path during periods when the Eastbank Esplanade is closed. There are already overcrowding issues on the west side of the waterfront during summer months, and these issues will be even more substantial during proposed temporary closures. Events such as Fleet Week, the Waterfront Blues Festival, and the Oregon Brewers Festival may result in even severe overcrowding when the Eastbank Esplanade is not available as an alternative route. Safety description is limited to conflicts w/ autos	Comment acknowledged, thank you. Addressed in FEIS with final design. Construction mitigation discussions are ongoing.	Sabrina Robinson
99054	Transportation - Long term traffic, freight & transit	Metro, Elissa Gertler, Alex Oreschak	3.1.6 (Mitigation) Pg. 3-36 First Bullet Support reducing the speed limit to 25 mph from 35 mph. In the City of Portland's 2020 Vision Zero Traffic Crash Report, Burnside is one of the top 30 high crash streets and states that the high crash data trends confirm that continued focus on speed is critical in eliminating traffic deaths and serious injuries.	Comment acknowledged.	Adrian Witte
99055	Transportation - Long term traffic, freight & transit	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-36: second bullet (mitigation) Support designing the intersection of W Burnside and NW 2nd Avenue as described. Also consider improvements to transit approaching this intersection, such as a transit-only lane and/or a queue jump for transit at NW 2nd Avenue.	Comment acknowledged. The County commits to continuing this coordination with the City and TriMet in advance of, as well as during, the Final Design phase.	Adrian Witte

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99056	Utilities	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-36: third bullet (mitigation) Suggest adding pedestrian lead intervals and bike approach warnings, where warranted, to considered traffic signal updates.	Comment acknowledged. Changes to the technical reports written for the DEIS were not revised as part of the FEIS. Where applicable, sections of the DEIS chapters were revised based on comments received during the DEIS public comment period or are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of FEIS errata.	Adrian Witte
99057	Transportation - Short term bike, ped & ADA	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-37 Proposed mitigation during construction for active transportation - suggest adding development of a detailed detour plan for pedestrians and bicyclists as part of the project. If this is already planned, it would be helpful to reference it. In addition to wayfinding signage and traffic calming, suggest considering other treatments to enhance safety and minimize out of direction travel time, including adjustments to signal timing for green wave bicycle travel, pavement markings, temporary bikeways on NE MLK Jr. Boulevard and NE Grand Avenue, temporary bikeway and walkway on the ODOT maintenance road adjacent to I-5, early implementation of nearby Central City in Motion projects, enhanced existing bikeways, and additional pedestrian crossing treatments. Additionally, if there is the possibility to increase the number, availability and access to bike share and scooter share, or free rides on streetcar and buses within the vicinity, these options could help shorten the travel distance for pedestrians. As much effort as possible should be made to minimize impact to people walking, bicycling and accessing transit.	Addressed in FEIS Mitigation section. A list of mitigations has been developed in coordination with the City, TriMet, ODOT and other partners that includes active transportation detours and improvements along active transportation routes to increase comfort and safety. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
99058	Transportation - Short term traffic, freight & transit	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-38, first bullet Support consideration of temporary closure of the Steel Bridge to all vehicles except bus and light rail in order to mitigate significant anticipated delays, particularly if Lines 12, 19 and 20 are rerouted to the Steel Bridge. This should be considered closely in consideration with additional transit priority on the Broadway and Morrison bridges and approaches, in order to mitigate impacts from traffic diversion to those bridges. Additional consideration should be given to implementation of transit-only lanes connecting W Burnside St. to existing transit-only lanes on NW Everett Street, and to connecting the Rose Quarter Transit Center with existing transit-only lanes on NE Grand Avenue and NE MLK Jr. Boulevard. These mitigations would be particularly important in the event that the I-5 Rose Quarter project closures occur at the same time as the Burnside Bridge project.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified detour routes and potential transit mitigations. The County commits to continuing coordination on mitigations with the City and TriMet in advance of, as well as during, the Final Design phase.	Adrian Witte
99059	Transportation - Short term traffic, freight & transit	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-38, second bullet This mitigation item should include a commitment to fund design, outreach, and construction related to transit mitigation measures. As with the Regional ETC pilot program, Metro should be identified specifically as a partner agency in development of these mitigations.	Comment acknowledged. Changes to the technical reports written for the DEIS were not revised as part of the FEIS. Where applicable, sections of the DEIS chapters were revised based on comments received during the DEIS public comment period or are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of DEIS errata. Metro has been added to the list of agencies.	Lewis Kelley
99060	Cumulative Impacts	Metro, Elissa Gertler, Alex Oreschak	3.1 (Transportation) Pg. 3-38, second bullet This should be a top priority for construction mitigation, and would be increasingly important in the event that the I-5 Rose Quarter project closures occur at the same time as the Burnside Bridge project.	The project is committed to preparing a transit management plan as outlined in the DEIS Summary, and further addressed in the Final EIS.	Adrian Witte
99061	Comment noted	Metro, Elissa Gertler, Alex Oreschak	3.5 (Economics) Pg. 3-67: third paragraph (and throughout, e.g. page 3-234) Please replace the word "accident" with the word "crash" when referring to traffic crashes. The use of the word crash is consistent with Portland and Metro's Vision Zero plans and policies which recognize that traffic crashes are preventable. Portland and Metro do not use the word accident when referring to traffic crashes.	Change made. Errata created.	Ewa Tomaszewska
99062	Transportation - Long term traffic, freight & transit	Metro, Elissa Gertler, Alex Oreschak	EQRB Facilities Standards List - Design Speed - Design, posted and target speeds should match at 25 mph. Burnside is posted 25 mph west and east of the bridge and should be 25 mph on the bridge as well. 40 mph is not appropriate for Civic Main Streets and emphasis on multimodal access.	Comment acknowledged. This was already included in the first bullet under Section 3.1.6 on page 3-37 of the Transportation Chapter.	Adrian Witte
99065	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Zef Wagner	Transportation- Page 5-31: Opening paragraph incorrectly states that the 2035 TSP designates Burnside as a City Bikeway. It is actually a Major City Bikeway. I have a large worry about how many residents within the Cascadia Subduction Zone do not have earthquake kits. It is an even more frightening idea that none of the bridges in Portland are expected to be usable following a significant earthquake.	Comment acknowledged. The text within Transportation Supplemental Memorandum included with the SDEIS has been revised to address this comment.	Lewis Kelley
98743	Comment noted	Hannah Chambers	I support updating the bridge to survive a major quake and to improve multimodal travel through the preferred alternative with no temporary replacement.	The project will not address the provision of earthquake kits to residents but will provide a bridge designed to withstand a Cascadia Subduction Zone earthquake event.	Shane Phelps
98744	Preferred Alternative	Hannah Chambers	Funding needs to be secured so this project can come to fruition and not be put on hold due to lack-there-of.	Comment acknowledged. The Preferred Alternative does not include constructing a temporary bridge.	Shane Phelps
98746	Project Cost	Hannah Chambers		Comment acknowledged.	Steve Drahota

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98747	Public Involvement	Hannah Chambers	I am saddened that I have not heard anything about this project prior to studying environmental impact statements in my courses. I think it is smart to have a Twitter account increase awareness and appreciate that public input has been encouraged by Multnomah County throughout the informal screening process.	Comment acknowledged, thank you. Public outreach efforts include a project website and social media to engage the public.	Sabrina Robinson
98813	Public Involvement	Hannah Chambers	I think it is important that the project implementers work with local houseless community members to obtain feedback regarding the project and adequately inform the community about construction periods. The online open house well summarizes the content and allows for those interested to make informed choices with links to all the PDF sections. The overall format of the DEIS is visually appealing.	Comment acknowledged, thank you. Informing and engaging the community has been an important focus of the project. Discussions with social service providers are ongoing.	Sabrina Robinson
98814	Purpose and Need	Hannah Chambers	The specific focus on equity, non-motor transportation, connectivity, built environment, and financial stewardship while selecting alternatives makes me feel the project is well organized and is intending to serve the local community.	Comment acknowledged.	Shane Phelps
98815	Preferred Alternative	Hannah Chambers	I support the preferred alternative and no temporary bridge plan because it is the least impactful while being the most seismically stable. I do not think that a temporary bridge is necessary because it would waste resources and create greater impacts. I think investing in quality infrastructure with the least amount of impacts is the only way our country will be viable in the future.	Comment acknowledged. The Preferred Alternative does not include constructing a temporary bridge.	Shane Phelps
98848	Archaeological and Historic Resources	Nick Halsey	There are a few sections of the DEIS that appear biased against retaining the bridge. For example, the historic section 104f analysis places unwarranted importance on the Burnside skatepark relative to the bridge. The impact of losing the national register listed bridge is orders of magnitude more significant than the impact of losing the register-eligible skatepark. Saving the skatepark barely makes a dent in mitigating the impact of losing the bridge.	As discussed in the DEIS, while the Retrofit Alternative is the only alternative that would not completely remove the Burnside Bridge, it would remove substantial portions of the bridge and result in changes that would be an adverse effect under Section 106, and would render the bridge no longer eligible for listing on the National Register of Historic Places. The Retrofit Alternative would also completely demolish the historic Burnside Skatepark, whereas the Replacement alternatives would maintain it. The permanent loss of the National Register eligible Burnside Skatepark is an important consideration in the Section 4(f) analysis, but is just one factor in the overall consideration for selecting a preferred alternative.	Shane Phelps
98854	Construction Methods	Nick Halsey	The analysis also appears to neglect the shorter construction time for the retrofit alternative. The seismic analysis report proposes phased construction that would enable temporary bridge access during construction. But other sections of the DEIS state that the retrofit requires a full 3.5 year closure. Table 2.2-2 states a 2 year closure for bridge access within the 3.5 year construction timeframe, compared to a 4 year closure with the long span alternative. Regardless of the specific duration, the retrofit alternative appears to deliver the project sooner and with shorter construction impacts than all replacement alternatives.	Yes the retrofit alternative has some advantages, including that it could be constructed in less time than the replacement alternatives, as noted in the DEIS, and as considered in the evaluation of alternatives. When considering all criteria, however, the Long-span Replacement alternative performs substantially better, and has much more support from the public and agencies.	Eric Rau
98857	Archaeological and Historic Resources	Nick Halsey	The team should take every practical measure to save as much of the history as possible. The massing and form of the historic bridge should be preserved even if the physical structure must be replaced.	The Refined Long-span Alternative, which was analyzed in detail in the Supplemental DEIS, and is the preferred alternative, is very similar in form to the existing bridge in the east approach (girder bridge) and the center span (bascule). The eastern span, in order to span the geological hazard zone, would have a very different form from the existing bridge.	Shane Phelps
98859	Preferred Alternative	Nick Halsey	The project team concludes that it is not possible to seismically retrofit the Burnside Bridge while maintaining its historic integrity and designation. They also propose a significantly different form to replace the historic bridge... a short-span replacement is more appropriate than a long-span bridge if the existing bridge cannot be saved.	When considering all criteria the Long-span Replacement alternative performs substantially better, and has much more support from the public and agencies.	Shane Phelps
98862	Public Involvement	Nick Halsey	Based on recent public outreach for bridge type selection, a hybrid-shorter-span approach seems probable for the west end of the bridge... Their repeated statements to the public that this is not feasible attempt to preemptively avoid such suggestions while showing that the community has already pushed for this approach.	The design team considered many aspects of both Short-span and Long-span Alternative options. Ultimately, the Long-span Alternative is anticipated to be more suited to withstanding a Cascadia Subduction Zone event due to having less supports on the east side.	Shane Phelps
98864	Archaeological and Historic Resources	Nick Halsey	However, the design team should also reconsider a shorter-span girder strategy for the east approach...It is of course possible to add one or more additional support piers, with corresponding geotechnical improvements, to reduce or eliminate the above-deck structure on the east side. While this may ultimately result in a design closer to the "short-span" alternative, minimizing the overall scale of the new bridge structure is necessary mitigation for the removal of the historic bridge. Do not forget that there are historic buildings at both ends of the bridge.	The design team considered many aspects of both Short-span and Long-span Alternative options. Ultimately, the Long-span Alternative is anticipated to be more suited to withstanding a Cascadia Subduction Zone event due to having less supports on the east side. A Long-span Alternative necessitates the use of an above-deck support structure. The historic buildings at both bridgeheads have been and continue to be a focus in the analysis of project effects.	Shane Phelps
98865	Social and Neighborhood Resources	Nick Halsey	The project team should consider how the bridge relates to all existing elements of the built environment. This includes the historic buildings at both bridgeheads, as well as the newer buildings on the east side, and the adjacent Willamette River bridges at a larger contextual scale. The Burnside Bridge represents both a critical functional link between high-density nodes and iconic wayfinding element as the central east/west axis for Portland. The design should better respond to these considerations than the existing bridge to support the approach to demolishing the historic bridge, even if the resulting design carries a larger cost.	Comment acknowledged. The historic buildings at both bridgeheads have been and continue to be a focus in the analysis of project effects.	David Ellis

Comment ID	Topic	Comment By	Comment	Response	Response By
98866-1	Preferred Alternative	City Club Earthquake Resilience Advocacy Committee (CCERAC), Tom Dyke	<p>We are members of the Earthquake Resiliency Advocacy Committee of the Portland City Club (CCERAC). We are writing you to strongly endorse the Long Span Bridge that is the preferred alternative in the Earthquake Ready Burnside Bridge (EQRB) Draft Environmental Impact Statement (DEIS). The current preferred alternative is supported by the recommendations of the City Club report "Big Steps Before the Big One" which were overwhelmingly approved by the Club membership in February of 2017. For the past five years, we have investigated and monitored plans for a Burnside Bridge that could withstand a catastrophic CSZ earthquake and submitted comments to the project. We have done this through our membership on the City Club research committee that authored this report and the succeeding committee to advocate for the recommendations of the report that were approved by the membership.</p> <p>(continued in 98866-2)</p>	Comment acknowledged.	Shane Phelps
98866-2	Preferred Alternative	City Club Earthquake Resilience Advocacy Committee (CCERAC), Tom Dyke	<p>(continued from 98866-2)</p> <p>In June 2020, the Project's Community Task Force (CTF) recommended that the Long-span Approach Alternative, and the No Temporary Bridge Option, be the Preferred Alternative (PA). We strongly endorse their two-year process and this recommendation. Our primary reason for endorsing the PA is that it has the highest seismic resilience ratings of the alternatives, which was the main concern of the City Club research committee. Secondly, the recommendation not to build a temporary replacement bridge will lead to a shorter construction time. An important part of our City Club research report recommendation urged haste in proceeding with a resilient bridge. The urgency is underscored by Figure S-1 in the DEIS Executive Summary showing the "overdue" forecast of the next great CSZ earthquake. We read again this morning in the Portland Oregonian (3/15/2021) of the 37% probability of a massive CSZ event in the next 50 years (based on geophysicist Chris Goldfinger's research at Oregon State University and other work). Thus, even a shortening of a year or two in the construction time is significant in securing a resilient bridge and the critical Burnside Street lifeline route.</p> <p>For these reasons we strongly endorse the PA Long Span Bridge plan and urge you to press on with this critical work as soon as possible. In our endorsement, we have confined our comments on issues that are directly addressed in the City Club recommendations voted on by the membership.</p>	Please enter this memo as part of the current public input and comment process. Comment acknowledged.	Shane Phelps
98867	Public Involvement	City Club Earthquake Resilience Advocacy Committee (CCERAC), Tom Dyke	We commend Multnomah County on the excellent public process and pace of the Burnside Bridge project.	Comment acknowledged, thank you.	Sabrina Robinson
98871	Comment noted	David Stein	While much of the EQRBB DEIS is relatively good in providing a vital link across the Willamette River, particularly in the event of a major earthquake there are a number of concerns that are not addressed, or are addressed poorly.	Comment acknowledged.	Shane Phelps
98873	Transportation - Short term bike, ped & ADA	David Stein	First the shutdown of the Eastbank Esplanade for months on end for a total of at least 1.5 years is completely unacceptable. The detours provided are significant and much more stressful to people walking, rolling, and biking due to the presence of cars and lack of physical protection. This closure needs to be mitigated further to mirror the closures of I-5 and I-84 ramp that can be measured in days. Given the lack of a temporary bridge to cut costs this should be a top priority to minimize the climate impacts of this project so people don't switch to cars instead.	Addressed in the FEIS Mitigation section. Mitigations have been identified, including detour routes, improvements along identified detour routes and potential transit mitigations. The County commits to continuing coordination on mitigations with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
98874	Transportation - Long term traffic, freight & transit	David Stein	The "future" potential westbound transit lane should be adjusted to a full transit lane from the start. Given that this connection will be closed for several years there will be nothing to miss from a driving perspective when the bridge opens. This will provide TriMet with more reliable routes crossing the Burnside Bridge in both directions rather than being snarled in traffic heading westbound. There will never be a better time to make this switch.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes two General Purpose lanes in the Westbound direction, and a combination of 1 General Purpose plus 1 Bus Only lane in the Eastbound direction. This would not preclude a future WB Bus-only lane should it be desired by the City in the future. The County commits to continuing this coordination with the City and TriMet in advance of, as well as during, the Final Design phase.	Adrian Witte
98876	Transportation - Long term bike, ped & ADA	David Stein	Further the space allocated for pedestrians and bicycles on both the west and east approaches of the bridge will be less than currently exists...For a project touting climate resilience this is a troubling situation as low and no carbon options for transportation are vital to any future in which carbon emissions are remotely under control and in line with city, regional, and statewide targets.	Comment Acknowledged. The bridge cross-sections at the midspan and both approaches balanced many demands. Bicycle and pedestrian facilities were given significant consideration and are improved with physically separated facilities, are marked improvement over the existing conditions. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
98878	Public Services	David Stein	In particular the need for sidewalk space on the west side near Portland Rescue Mission is in even higher demand than anywhere else near the bridge and more space than currently present will be needed for services to be provided and safe and comfortable travel for people on foot.	Access to Portland Rescue Mission be maintained through construction and further information can be found in the Social/Neighborhood Technical Report.	Garrett Augustyn

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98879	Transportation - Long term traffic, freight & transit	David Stein	There are some other areas of concern as well. The 11' lane widths for auto lanes on the bridge are likely to lead to higher speeds and the extra space could be better allocated toward uses that are less destructive on the environment and other people.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes two General Purpose lanes in the Westbound direction, and a combination of 1 General Purpose plus 1 Bus Only lane in the Eastbound direction. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase. This includes the determination of lane dimensions as part of the Final Design phase.	Adrian Witte
98882	Active Transportation Access Options	David Stein	Pedestrian and bicycle connections for this bridge need to be both robust and plentiful - on the east side in particular ramps and stairs should be considered in tandem rather than substituting an elevator as a replacement for each. An elevator is going to be worthless in the event of a major CSZ quake which is one of the major pretenses for this project so the design should be reflective of the conditions that the City needs to function as quickly as possible following that specific type of event.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
98883	Comment noted	Portland Freight Advisory Committee (PFC), Stephanie Lonsdale	Burnside Draft EIS team, The Portland Freight Advisory Committee appreciates the leadership of Multnomah County in working to develop an Earthquake Ready Burnside Bridge. The Burnside Bridge provides a key connection in Portland's Central City and will play an important role following a Cascadia earthquake. The Portland Freight Advisory Committee has two major recommendations regarding the recommended project.	Comment acknowledged.	Shane Phelps
98884	Transportation - Long term bike, ped & ADA	David Stein	This project represents many improvements to our transportation network and with some revisions could be even better. It is my hope that any changes made between now and construction enhance conditions for people who do not utilize a car for travel in this area so that cars won't be as necessary during and following construction.	Comment acknowledged.	Lewis Kelley
98891	Comment noted	Steve Dotterrer	Thanks for the opportunity to comment on the Burnside Bridge DEIS. My comments are related to Chapter 3, sections 1, 11 and 12.	Comment acknowledged.	Shane Phelps
98898	Active Transportation Access Options	Steve Dotterrer	Section 3.1 Transportation, pedestrian and bicycle circulation: While the DEIS describes the existing pedestrian and bicycle environment, it should also discuss that environment that will be in place before the bridge decision is implemented. The Better Naito project, with a two-way bikeway on the east side of Naito Parkway is likely to result in significantly different bicycle traffic patterns and desire lines. In particular, the functionality of the proposed bike/ADA ramp from the bridge to SW 1st Ave. would be of less benefit than is the situation with the current bike lanes on both sides of Naito.	Bicycle and pedestrian travel volumes were based on 2019 counts. The EQRB facilities were then compared to other bridge multi-use pathways in which larger volumes are using the bridge. Based on these assessments, as well as forecasts for changes in bicycle/pedestrian uses and balancing the need for roadway width to support post-earthquake recovery, the current range of dimensions were established.	Steve Drahota
98900	Active Transportation Access Options	Steve Dotterrer	The improvements for the west approach section should also address what is proposed for the intersection of W Burnside and 2nd Ave. Commitments were made in the past to restore the crosswalk of Burnside on the east side of 2nd Ave. The project should include this crosswalk, which was only removed when two right turn lanes were installed from SW 2nd to the Bridge approach. SW 2nd is no longer designed as a major auto access route to the bridge and restoring its function as a multi-purpose street seems desirable (and may reduce the need for the suggested mid-block crossings). Restoring the crosswalk when the Burnside Bridge west approach is reconstructed is the most logical time to make that improvement.	The Project will likely restore the crosswalk at this location. This will be determined as part of the Final Design phase.	Steve Drahota
98903	Archaeological and Historic Resources	Steve Dotterrer	Section 3.11 Historical and Archeological Resources: It is worth noting the change in title for this section. In the online technical report and summary of the technical report, this section is called Cultural Resources. I believe that this is an important difference, and some of my comments relate to cultural significance. The DEIS focuses almost entirely on the individual physical objects. Cultural elements that are completely ignored in the document are the recent Black Lives Matter and other demonstrations on the bridge and civic events like the annual Rose Festival parades that use the bridge as their route to connect the east and west sides of the City. The open above-the-roadway-deck nature of the Burnside Bridge, combined with the lack of direct freeway connections, make the bridge ideal for these civic functions. These civic functions are also enhanced by the specifically "City Beautiful" features of the bridge, including the formal elements like the handrails, towers and sheltered waiting areas. As a result, the Burnside Bridge is the only bridge which encourages people to use the bridge as a viewing area for parades, celebrations and demonstrations. And the bridge's current design enhances that civic role because it is an iconic element in the cityscape.	The DEIS uses the phrase "Historical and Archaeological Resources" as more descriptive for the reader/reviewer but does not exclude other resources of cultural importance. The technical report has been prepared to meet requirements of both NEPA and the National Historic Preservation Act (NHPA) and therefore uses the term "Cultural Resources" that is widely employed in the NHPA context. Both phrasings address the same spectrum of resources.	David Ellis
98904	Preferred Alternative	Steve Dotterrer	This lack of description of the cultural events and significance of the bridge means that the document does not provide an adequate guide to the importance of either retaining the existing bridge or in designing the replacement. The replacement alternatives being advanced are a clear result of this lack of understanding of several features of the bridge design which contribute to the bridge's cultural role.	Addressed in DEIS Errata. Cultural and social events and activities in the area of potential impact are discussed in the Parks and Recreation and Social/Neighborhoods sections of the Draft EIS and Supplemental Draft EIS.	Jennifer Hughes

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98905	Archaeological and Historic Resources	Steve Dotterrer	<p>Detailed comments include: The section identifies the existence of four potential archeological sites with potential Native American significance, but then drops any further mention. Is this because they are deemed insignificant or because the information is not public?</p>	The four previously identified archaeological sites are defined by late nineteenth- and early twentieth-century deposits. No precontact archaeological resources have been identified to date within the Project APE.	David Ellis
98906	Archaeological and Historic Resources	Steve Dotterrer	<p>The elements of the Burnside Bridge as an historic resource are not adequately described. As an example of a late "City Beautiful" period structure, the bridge has a strong civic character appropriate to a civic monument. The mix of functional and aesthetic thinking that went into the bridge was reflected in the three types of railings on the original bridge. For the lift spans, a lighter weight but fairly elaborate metal hand railing, for the fixed sections, handrails of concrete supported by classical but concrete balusters. And in the original bridge approaches, "temporary" metal pipe rails where the designers assumed buildings would replace vacant sites or small buildings. The designer's assumption was that the bridge sidewalks would become the street sidewalks in the future. In other words, the bridge would be integrated into the cityscape. This actually happened in a few cases, but the proposed designs seem to ignore that possibility in the future. Other elements include the towers with their decorative features, the rain-shelter waiting areas, and the upriver face of the piers designed to look like ships. All of these should be recognized in the bridge description, as they are important to understanding the cultural significance of the bridge as a civic and cultural object.</p>	A greater description of the historic and social importance of the Burnside Bridge is in DEIS errata 3.11.1. Within the framework of meeting NEPA and NHPA requirements, the Burnside Bridge's listing on the NRHP is the primary consideration. The EQRB Project will have an adverse effect on the bridge regardless of the alternative. Those elements that contribute to the bridge's significance will be important in defining mitigation options.	David Ellis
98907	Archaeological and Historic Resources	Steve Dotterrer	<p>The description of the Skidmore Old Town historic district is similarly a description of individual buildings and their styles, and not a description of the cultural significance and overall form of the district. The district, before this bridge was built, was a fairly densely occupied area with relatively low scale buildings built out to the property line on virtually all the sites—producing a very strong sense of the "street wall," emphasized in the detailed design of all of the buildings built during the period of significance for the district. While the 1920's Burnside Bridge brings that period of significance to an end because of the widening of the street and removal of all or part of the adjacent buildings, the designers of the current bridge clearly assumed that the "street wall" would be restored as continued growth and development happened in the area. (described in the previous paragraph about the various handrails).</p>	Comment acknowledged.	David Ellis
98908	Active Transportation Access Options	Steve Dotterrer	<p>Because the DEIS technical work did not cover these important cultural implications of the district, the bridge alternatives treat the bridge design as a strictly engineering problem, without any role in city-making. This is particularly notable in the suggested solution of a long convoluted ramp for ADA and bike access from the bridge to SW 1st Ave. This would require a major property acquisition and eliminate the possibility of restoring a "street wall" and the sense of tight enclosure of public space on SW Ankeny between 1st and 2nd Avenues. It would also deny the creation of a "street wall" on the Burnside Bridge street approach itself. It also has the drawback of making a new public space around the ramp itself that will be hard to manage or use in any appropriate manner.</p>	The understanding of the role of the bridge in the function of the City is implicit in the analysis performed for several elements including Social and Neighborhoods, Visual, Parks and Recreation, Environmental Justice, and Transportation, among others. Numerous outreach activities which garnered public and agency input occurred prior to and during the writing of the DEIS which informed the impact analysis. Stakeholder input will continue through the FEIS phase and into final design, further ensuring that the bridge's role in "city-making" is thoroughly considered. Regarding ADA and bike access, several design options have been considered; text description and figures of the various designs are meant to serve as a potential range of the type of design for ADA and bike access that could be selected. The selected design will ultimately be decided by the City after completion of the FEIS.	Shane Phelps
98909	Archaeological and Historic Resources	Steve Dotterrer	<p>The bridge approach alternatives also fail to describe adequately their impact on the district. The alternatives do not describe adequately the varying impacts on the district among the various truss and cable-stay alternatives. The recent addition of a deep beam alternative makes clear how great those impacts would be—and how an alternative is realistically available.</p>	The Supplemental DEIS acknowledges potential impacts to the NHL and explains that the Refined Long-span Alternative with the girder style bridge on the west end (that does not include a superstructure) would not cause an adverse effect to the NHL. This conclusion is based on the Finding of Effect attached to the Section 4(f) analysis.	David Ellis
98910	Visual and Aesthetic Resources	Steve Dotterrer	<p>Section 3.12 Views/Visual Impacts: The description section here is confined to the immediate environs of the bridge, primarily the historic districts. There should be additional description of the larger cityscape as visible from the bridge. That larger cityscape includes both the east and west sides of the river as well as the river itself. The Burnside Bridge is one of the few bridges that allows the user to get a sense of Tualatin Mtns., the entire downtown cityscape as a whole and the river. This is a result of the open above-the-roadway nature of the current bridge, a character which is not available with most downtown bridges. The description of impacts subsection appears to recognize this missing description, as there is some description of the impact of the various alternatives on this larger view, but that description is extremely brief and needs to be enhanced.</p>	Addressed in DEIS errata, section 3.12.1.	Josh Carlson
98911	Comment noted	Steve Dotterrer	Thanks again for the opportunity to comment.	Comment acknowledged.	Shane Phelps

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98912	Purpose and Need	Portland Freight Advisory Committee (PFC), Stephanie Lonsdale	In addition to the EQRBB handling normal freight loads during regular operation, the Burnside Bridge should ensure that large over-dimensional vehicles can use the bridge after a Cascadia event. There are currently no bridges in Portland's Central City that were designed sufficiently to remain operational after a major Cascadia event. Given the likelihood that the EQRBB is the only remaining bridge after a Cascadia event, it is critical that the bridge be able to handle over-weight and over-dimensional vehicles that will be essential in responding to critical life, safety and earthquake response needs. The Portland Freight Committee appreciates that the EQRB NEPA documents call for designs that will allow for over-weight and over-dimensional vehicles.	The bridge dimensions, both horizontally and vertically, will accommodate over-dimensional and over-weight vehicles necessary to support emergency service operations following the CSZ earthquake. Exact loading criteria will be established during the Final Design phase.	Steve Drahota
98913	Transportation - Long term traffic, freight & transit	Portland Freight Advisory Committee (PFC), Stephanie Lonsdale	The EQRBB should be designed to be effectively and efficiently used by freight. The Portland Freight Committee supports designing the EQRBB to ensure the efficient and safe travel of vehicles. The Burnside Bridge provides an important link in both the city and regional network. Portland's Central City hosts a high volume of people driving, taking transit, walking, and rolling. We support a final design that is consistent with the safe and efficient freight movement – including access to the bridge for the larger intermodal network... Freight travel time reliability is key to freight logistics and timely deliveries to Portland businesses and industries.	Comment acknowledged.	Adrian Witte
98915	Utilities	Portland Freight Advisory Committee (PFC), Stephanie Lonsdale	New traffic signals on the bridge should be interconnected with the bridge lift and the nearest land-based signal... Synchronized signal operations and minimizing freight travel delays will help Portland businesses remain competitive and prosperous.	Comment acknowledged. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Adrian Witte
98919	Preferred Alternative	Jon Wood	I oppose demolishing the Burnside Bridge. I advocate retrofitting the Burnside Bridge so that it can withstand earthquakes.	Comment acknowledged. The DEIS identifies the Long-span Replacement Alternative as its preferred alternative.	Shane Phelps
98921	Preferred Alternative	Jon Wood	If ultimately, the Burnside Bridge must be demolished, I support building a replica of the current bridge to replace it.	Comment acknowledged. The DEIS identifies the Long-span Replacement Alternative as its Preferred Alternative. Please see Chapter 2, Section 2.6.	Shane Phelps
98925	Comment noted	Rose City Astronomers, Dawn Nilson	Thank you for the opportunity to comment on the EQRB Draft EIS. Attached please find my comments on behalf of Rose City Astronomers. Please feel free to contact me if any further clarification is needed. Receipt of this email is appreciated.	Comment acknowledged.	Shane Phelps
98926	NEPA Process	Rose City Astronomers, Dawn Nilson	Rose City Astronomers (RCA) is a local, non-profit organization of over 700 member families dedicated to promoting the enjoyment and education of astronomy to our members and the general public since 1988. RCA has been actively advocating to control light pollution in the Portland Metro Area since 2009. We have reviewed the EQRB Draft EIS and affiliated background documents and find that more information is needed to be able to conclude that project-related light pollution and its harmful impacts to fish and wildlife, human health and safety, and our cultural heritage of a starry night sky have been adequately assessed and will be commensurately mitigated.	Thank you for your input. The precise level of lighting will be determined as part of the Final Design phase, and subsequent permits from the City of Portland will be sought based on this analysis.	Steve Drahota
98927	Comment noted	Willie Levenson	Please accept the attached comments to the Burnside Bridge DEIS. As well as attached Exhibit 1 - rendering and Exhibit 2- Presentation of Comps (sent via WeTransfer). Many thanks for the bridge design teams full consideration of the feedback of Human Access Project.	N/A.	Adrian Witte
98928	Comment noted	Willie Levenson	Human Access Project (HAP) comments to the Draft Environmental Impact Statement (DEIS) for the Burnside Bridge Replacement are below. Thank you to the team for giving our feedback full consideration. The concept in Exhibit 1 is HAP's proposal for an ADA-accessible link from the bridge to the Esplanade for pedestrians, bicyclists and people with disabilities in response to what was included in the DEIS. Further, Exhibit 1 provides alternatives for on-site mitigation for sound and air pollution associated with both construction and on-going operations as well as on-site habitat mitigation for impact to shallow water habitat and in water work. Thank you for including our Exhibit 1 in the public record.	Comment acknowledged.	Shane Phelps
98929	Cumulative Impacts	Rose City Astronomers, Dawn Nilson	We regrettably were not engaged with the design and environmental review of the most recent Willamette River crossing in Portland, namely TriMet's Tilikum Crossing Bridge. The lighting of that bridge, which is brighter than natural daylight, exemplifies the general lack of understanding and attention to the serious issue of light pollution. Staff at TriMet have subsequently said that if they knew then what they knew now about light pollution, they would have designed the bridge lighting differently. It's been more than five years since construction was completed on that bridge, and we are all the wiser about the well-established, scientifically documented impacts of light pollution and how to avoid or minimize it. Therefore, we would like to see some level of assurance in the Final EIS that Portlanders won't end up with another wonderfully aesthetic bridge that is also sadly over-illuminated with harmful blue-rich white lighting that cumulatively contributes to skyglow, creates light trespass, disturbs aquatic species, migratory birds, and terrestrial vegetation.	Thank you for your input. The precise level of lighting will be determined as part of the Final Design phase, and subsequent permits from the City of Portland will be sought based on this analysis.	Steve Drahota

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98930	NEPA Process	Rose City Astronomers, Dawn Nilson	Light pollution is a type of pollution that falls under an array of topics generally assessed within an impact assessment, including: human health and safety, vegetation and wildlife, aquatic resources, climate change, energy, aesthetics, cultural resources, and environmental justice. In addition, its effects are cumulative. Therefore, we suggest that like other topics that have been isolated for assessment in the last decades, such as energy, environmental justice, and now climate change, the topic of light pollution begin to be assessed separately in projects under the direction of the Federal Highway Administration. This type of attention assures that light pollution mitigation measures are clearly considered, enumerated, and carried forward into project design and construction.	Thank you for your input. The precise level of lighting will be determined as part of the Final Design phase, and subsequent permits from the City of Portland will be sought based on this analysis.	Steve Drahota
98931	Parks and Recreation	Willie Levenson	Outside of Exhibit 1, the other request is that the project area for the bridge work be mindful of the Kevin Duckworth Memorial Dock on the Eastbank Esplanade north of the Burnside Bridge. If the project area can stop short of the dock entrance, this river asset can continue to be utilized during Burnside Bridge construction. It could then still be accessed via the Rose Quarter entrance to the Esplanade. It would be a further impact to river recreation should this dock have to be closed due to the bridge construction.	Addressed in DEIS Errata Section 3.10.2 clarifying that the Duckworth Dock will be available during construction.	Jennifer Hughes
98932	Comment noted	Willie Levenson	The Burnside Bridge Replacement is a necessary investment that will impact the Portland community. Impacts will include closure of Waterfront Park and Eastbank Esplanade for 18 months to 4.5 years, impacts to natural resources such as fish and wildlife, and environmental justice issues with noise and air pollution. Below are some proposed mitigations that are represented as a rendering in Exhibit 1. Further, there is a chance to address the equity issue facing our county and city that has not been resolved. Currently, there is not one ADA river edge access space in our central city. Highlights of the proposed mitigations (as numerated in Exhibit 1) are as follows:	Comment acknowledged.	Shane Phelps
98933	Vegetation, Wildlife and Aquatic Resources	Rose City Astronomers, Dawn Nilson	Lighting impacts are noted for traffic and safety and terrestrial wildlife, but not under any other topic, particularly plant and aquatic species. This stresses the need to address light pollution separately per our first comment. There is an abundance of scientific literature showing that the degree of biological harm for a range of species is somewhat proportional to the amount of artificial light at night (ALAN), and that the degree of harm is strongly proportional to correlated color temperature (CCT). Even moderate and low ALAN can disrupt living systems. Please address lighting impacts beyond what has been noted already in the EIS.	Comment acknowledged. Lighting will adhere to City of Portland illumination guidelines.	Rachel Barksdale
98934	Active Transportation Access Options	Willie Levenson	Bridge Ramp Connection: NO ELEVATOR. STRONGLY AGAINST INSTALLATION OF AN ELEVATOR. Elevators are costly to install, have ongoing operational costs and ARE NOT PANDEMIC friendly. Elevators are nonoperational in pandemic times. For long-term planning, we need to expect a pandemic will happen again. Unless the elevator is staffed year-round 24 hours a day, it will be ripe for vandalism, urination, safety vulnerability, and increased maintenance costs. If the elevator is staffed, that would represent additional ongoing costs that would be very vulnerable to budget cuts. Should elevator staffing be cut, this would shut down the elevator or make it significantly less usable due to vandalism, urination, safety and proper upkeep. People will not use an elevator that smells or feels unsafe. Further, there is no clear consensus among disability groups as to whether it would be used by people with disabilities due to the reasons cited above.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
98935	Preferred Alternative	Willie Levenson	New Burnside Bridge – No feedback on choice of design other than the lower the connection point of the Bridge to the ramp, the shorter the distance of the bridge ramp to the Eastbank Esplanade.	Comment acknowledged. The FEIS Preferred Alternative identifies protecting the existing stairs in place . A potential ramp or other ADA connection to the Burnside Bridge from the Eastbank Esplanade is now a separate project being studied by the City.	Shane Phelps
98936	Active Transportation Access Options	Willie Levenson	Existing Esplanade Ramp – The proposed Exhibit 1 considers and leverages the existing ramp which connects the "hard" section of the Esplanade to the floating section of the Esplanade. There will be no modifications needed to this existing ramp.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota

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98937	Active Transportation Access Options	Willie Levenson	<p>ADA Accessible Ramp from Bridge to Esplanade – This is proposed to have a standard ADA grade of 5%. The ramp as proposed would first extend to make a connection to the Eastbank Esplanade, then cross back to provide an opportunity to “roll into the river”. This would solve an ADA issue for Multnomah County as there are not currently any ADA opportunities to get into the Willamette River. This would perhaps be the first ADA accessible opportunity to get into a natural body of water in the County and is long overdue. This is an equity issue, people of all mobility levels should have an opportunity to experience our city’s second largest public space and natural area, the Willamette River, which is safe for recreation from a human health perspective.</p> <p>Further, a ramp is a more pleasant experience than an elevator and is never taken out of use. The person using the ramp, will have wide sweeping views of downtown and the river.</p>	<p>Comment acknowledged. As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on the east side of the Willamette River.</p> <p>For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.</p>	Steve Drahota
98938	Stormwater	Willie Levenson	<p>Stormwater Treatment Area – This is an opportunity to satisfy a mitigation requirement of the bridge to manage stormwater runoff. Ideally this would be constructed as a demonstration raingarden to educate the public about the importance of green infrastructure, which is in line with sustainability goals for Multnomah County.</p>	<p>Comment acknowledged. The FEIS Preferred Alternative will protect the existing City stairs in place. Based on City of Portland decision, the City may pursue replacement of the Eastbank Esplanade access to the bridge as a separate project.</p>	Cory Gieseke
98939	Active Transportation Access Options	Willie Levenson	<p>Stairs to the Esplanade – To create greater flow and access to the Esplanade, the ADA ramp would be supplemented with stairs, affording great views of downtown and the river as people move down to the Esplanade. Further, a well-designed bike gutter can be added as an alternative access for cyclists if they do not want to use the ramp for some reason.</p>	<p>Comment acknowledged. As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on the east side of the Willamette River.</p> <p>For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.</p>	Steve Drahota
98940	Active Transportation Access Options	Willie Levenson	<p>Existing Esplanade Overlook – The proposed Exhibit 1 would leverage the existing Esplanade Overlook. The proposed “Gateway to the Esplanade” would create new traffic bring more use to this existing asset.</p>	<p>Comment acknowledged.</p>	Steve Drahota
98941	Active Transportation Access Options	Willie Levenson	<p>Water Level ADA Pedestrian Access – Beyond getting people living with disabilities to near the rivers edge, this element would allow people with mobility challenges to get their toes in the water as well.</p>	<p>Comment acknowledged.</p>	Steve Drahota
98942	Active Transportation Access Options	Willie Levenson	<p>Ramp Overlook – In line with proper ADA design, this overlook will provide a rest area for people with disabilities and pedestrians as well as views of downtown.</p>	<p>Comment acknowledged.</p>	Steve Drahota
98943	Visual and Aesthetic Resources	Rose City Astronomers, Dawn Nilson	<p>The EIS essentially states that bridge lighting will meet local standards, temporary impacts of construction lighting will be addressed through best management practices, and mitigation to minimize potential impacts from permanent bridge lighting will be determined in final design. The problems with these generalized statements are that: (1) the relevant lighting standards are not cited, and to date, local standards are not fully responsive to the body of research related to human night vision dynamics, actual safety needs versus perception, or any of the ecosystem impacts related to artificial light at night and light pollution; (2) neither local or project-specific best management practices are cited, and the BMPs listed in the mitigation table of the EIS make no mention of any BMP(s) that addresses lighting impacts; (3) there is sufficient guidance by the International Dark-Sky Association (IDA) (https://www.darksky.org/our-work/lighting/lighting-for-citizens/lighting-basics/) and outlined in Dark Skies Project: Strategies for Reducing Light Pollution in Portland (adopted by City Council on Sept. 17, 2020) to outline design guidelines in the FEIS that will mitigate lighting impacts versus punting these provisions to final design and risk having these provisions fall through the cracks.</p>	<p>The precise level of lighting will be determined as part of the Final Design phase, and subsequent permits from the City of Portland will be sought based on this analysis.</p>	Steve Drahota
98944	Parks and Recreation	Willie Levenson	<p>Terraced Seating / Steps – Terraced Seating is a concept that is found regionally, nationally, and internationally. It is a very elegant way to acknowledge the highs and lows of a river and flood control seasonally, while providing passive recreational opportunities. As the river rises, stairs will be underwater, as the river lowers, more stairs are revealed. This serves as an alternative to rip-rap armoring and offers better functionality.</p> <p>This item is viewed as potential mitigation to the extreme impact on the Esplanade with closure anticipated at 18 months to 4.5 years. There is a potential nexus of loss of park access being offset with an upgraded park, and improvement of the bank for passive recreation offsetting the impact from closure. At all times of the year, people would be able to sit at the river’s edge and enjoy the therapeutic mental health benefits of proximity to water.</p>	<p>Comment acknowledged. The FEIS Preferred Alternative will protect the existing City stairs in place. Based on City of Portland decision, the City may pursue replacement of the Eastbank Esplanade access to the bridge as a separate project.</p>	Jennifer Hughes

Comment ID	Topic	Comment By	Comment	Response	Response By
98945	Vegetation, Wildlife and Aquatic Resources	Willie Levenson	Woody Debris for Habitat – Regardless of what approach is made with the bridge design, there will be permanent new fill in the river/floodplain, a good portion of which will be in shallow water habitat. Woody debris provides a resting place for juvenile salmon which could serve as mitigation to the very sensitive riparian habitat being impacted.	Comment acknowledged. Mitigation coordination is ongoing. Additionally, mitigation is discussed in the NMFS Biological Opinion.	Rachel Barksdale
98946	Parks and Recreation	Willie Levenson	Existing Esplanade – The proposed Exhibit 1 would leverage the existing Esplanade. The proposed "Gateway to the Esplanade" would create new traffic which would bring even more use to this existing well used asset.	Comment acknowledged. The FEIS Preferred Alternative will protect the existing City stairs in place. Based on City of Portland decision, the City may pursue replacement of the Eastbank Esplanade access to the bridge as a separate project.	Jennifer Hughes
98947	Active Transportation Access Options	Willie Levenson	ADA Ramp to Water Level – As stated above, this would solve an ADA issue for Multnomah County as there are currently no ADA opportunities to get into the Willamette River.	Comment acknowledged. As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on both the west and east sides of the Willamette River. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahot
98948	Stormwater	Willie Levenson	Stormwater Treatment Area – As stated above, this is an opportunity to satisfy a mitigation requirement of the bridge to manage stormwater runoff.	Comment acknowledged. The FEIS Preferred Alternative will protect the existing City stairs in place. Based on City of Portland decision, the City may pursue replacement of the Eastbank Esplanade access to the bridge as a separate project.	Cory Gieseke
98949	Vegetation, Wildlife and Aquatic Resources	Rose City Astronomers, Dawn Nilson	<p>Just as there are temporal water quality provisions to conduct work during the In-water Work Period for protected salmonids, we recommend including temporal provisions of night-time construction and bridge operation during the spring and autumn bird migration period and during peak salmonid migrations. Lighting, including the light of the moon, factors into bird and salmonid migrations.</p> <p>Given the sensitive nature of a river corridor, we recommend that lights be dimmable, directed to the road surface, fully shielded, only as bright as genuinely needed for wayfinding, and that the color temperature of any bridge and bridge access lighting not exceed 2,700 kelvin.</p>	Comment acknowledged. Illumination will adhere to City of Portland guidelines.	Rachel Barksdale
98950	Parks and Recreation	Willie Levenson	Stairs to Ramp and Water Level – This is an extension of the idea of providing passive recreational opportunity, "Toes in the Water" access, bank stabilization, and flood protection. According to Portland Parks and Recreation, less than 5% of our central city has access to the river's edge. Being close to the water's edge provides physiological benefits, and recreating in the river provides health benefits. The addition of stairs to the river would be a mitigation to the closure of the Esplanade for 18 months to 4.5 years.	Comment acknowledged. The FEIS Preferred Alternative will protect the existing City stairs in place. Based on City of Portland decision, the City may pursue replacement of the Eastbank Esplanade access to the bridge as a separate project.	Jennifer Hughes
98951	Visual and Aesthetic Resources	Rose City Astronomers, Dawn Nilson	<p>As well as addressing light output, shielding, color temperature, and lighting duration, the County is strongly encouraged to add levels of light uniformity in its bridge lighting design standards. Per John Barrentine, IDA's Policy Director, "Good lighting design will ramp up/down the light levels in the transition areas, giving the viewer's eye some time to adjust to the changes. We (IDA) think this is a fundamental public safety issue, and that poor design in this respect can be as dangerous as no lighting at all. The decision to light an area in the first place should be based on safety, but the design that follows must be as careful in order to ensure that lighting doesn't make a situation worse." This policy is further supported by a recent study conducted by the Monash University, XYX Lab, and ARUP on safety perceptions, which concluded "Consistent and layered lighting – where there are multiple light sources and where surfaces with different reflective values are taken into consideration – makes women feel most safe. This kind of lighting reduces the "floodlit effect," the sharp drop-off of light beyond the path, and the potential for glare and contrast to blind and disorientate." A good, comparative example of night sky friendly lighting on a water crossing is provided in Figure 1.</p> <p>[Photos attached] Figure 1. Example of night sky friendly lighting (left photo) that addresses traffic and pedestrian safety as well significantly reducing the adverse impacts of artificial light at night compared to typical "standards" for road lighting (right photo).</p>	The precise level of lighting will be determined as part of the Final Design phase, and subsequent permits from the City of Portland will be sought based on this analysis.	Steve Drahot
98952	Noise and Vibration	Willie Levenson	Sound / Visual Barrier Along Freeway – Noise and air pollution will be created through construction, and vehicle traffic from the bridge will create ongoing noise and air pollution. This is an environmental justice issue. The addition of a barrier formed by the ramp from the bridge to the Esplanade will mitigate both air and noise pollution from construction and form a permanent nexus with the bridge construction.	Comment acknowledged. No change. The noise technical report documents the noise barrier analysis conducted for noise abatement. Per ODOT regulations the noise abatement was not found to be feasible and reasonable; therefore, it is not included in the project.	Scott Noel
98953	Vegetation, Wildlife and Aquatic Resources	Willie Levenson	Enhanced Riparian Planting – There is an opportunity for upland habitat restoration. Enhanced riparian planting could be part of a mitigation package to address in water mitigations.	Riparian restoration is anticipated on the east side of the river. See Section 3.16.4 of the DEIS for more details on mitigation.	Rachel Barksdale

Comment ID	Topic	Comment By	Comment	Response	Response By
98954	Active Transportation Access Options	Willie Levenson	Ramp Connection to Existing Esplanade – The proposed Exhibit 1 would leverage the existing Esplanade.	Comment acknowledged.	Steve Drahota
98955	Comment noted	Willie Levenson	Thank you again for full consideration of Human Access Project's feedback and introduction of HAP's Exhibit 1. Please do not hesitate to reach out if you have any other questions regarding HAP's input.	Comment acknowledged.	Shane Phelps
98709-1	Comment noted	Michael Chang	<p>Dear Emily Cline, My name is Michael Chang and I am a student at Portland State University studying environmental science. We are learning about the Environmental Protection Agency through Environmental Impact Assessments (EIA) and Environmental Impact Statements (EIS). The Earthquake Ready Burnside Bridge draft EIS proposed an earthquake resilient bridge that crosses the Willamette River and would remain in operation during the next Cascadia Subduction Zone (CSZ) earthquake. This is especially important for the city of Portland because none of the bridges downtown are seismically resilient. In the event of an earthquake, emergency responders will not be able to cross, leaving a large portion disconnected. Creating a new bridge that can withstand earthquake events would provide transportation and connection across the Willamette River. The preferred alternatives of the long-span bridge approach and the no-build alternative were recommended and fully have my support. The process identified and evaluated input from technical experts, participating agencies, and other stakeholders including the public through online open houses and surveys. The Community Task Force (CTF) also took into consideration thirteen different topics such as seismic resiliency, natural resources, parks and recreation, and cost. A good in-depth analysis of the preferred alternatives shows that everything that the project could potentially affect was taken into consideration. (continued in 98709-1)</p>	Comment acknowledged.	Shane Phelps
98709-2	Comment noted	Michael Chang	<p>(continued from 98709-1) The long-span bridge approach carries the least amount of risk compared to the other alternatives. With the least disturbance to the Waterfront Park as well as the smallest footprint in the river shows that the long-span is the most environmentally friendly bridge alternative. In addition, the long-span bridge has the lowest cost alternative as well as the least seismic resilience risk. All the build alternatives would be seismically resilient but the long-span would have the fewest piers in potentially hazardous areas. The long-span bridge alternative clearly has the most advantages and has my support for the best bridge design alternative.</p>	Comment acknowledged.	Shane Phelps
98710	Comment noted	Audubon Society, Bob Sallinger	I appreciate the opportunity to review this Draft EIS. If you have any questions, please contact me at chang22@pdx.edu.	Comment acknowledged.	Shane Phelps
98711	Comment noted	Audubon Society, Bob Sallinger	Dear Multnomah County, Please accept the attached comments from Audubon Society of Portland regarding the Burnside Bridge EIS.	Comment acknowledged.	Shane Phelps
98712	Preferred Alternative	Audubon Society, Bob Sallinger	I am writing on behalf of the Audubon Society of Portland and our 17,000 members in the Portland Metropolitan Region regarding the Burnside Bridge Draft EIS.	Comment acknowledged.	Shane Phelps
98713	Comment noted	Audubon Society, Bob Sallinger	In general, we believe that the County and partner agencies have done a good job considering issues and we support the preferred alternative: Long-span approach alternative with no temporary bridge.	Comment acknowledged.	Shane Phelps
98714	Comment noted	Audubon Society, Bob Sallinger	We would respectfully request that the County evaluate and integrate the following concerns into the Final EIS:	Comment acknowledged.	Shane Phelps
98715	Social and Neighborhood Resources	Japanese Museum of Oregon (formerly Nikkei Legacy), Lynn Longfellow Fuchigami	<p>We appreciate the public outreach that has been done regarding the impact that the Earthquake Ready Burnside Bridge Project will have on the City of Portland and its people.</p> <p>The Japanese American Museum of Oregon has concerns with regards specifically to the impact on our Japanese American Historical Plaza, as the south end of the Plaza is within the construction staging area or directly adjacent to the staging area and work on the bridge.</p> <p>The EIS recognizes this in the Social and Neighborhood Resources with mitigation called out to return resources to previous or better conditions as well as assistance for compensation and relocation. We are concerned that the impact to the Plaza is not recognized in the Economic Impacts and Noise and Construction sections of the EIS as there will be certain impacts in those areas as well.</p>	Addressed in SDEIS. SDEIS discusses reducing impacts to the trees. Impacts are to the grassy area of the plaza including a few cherry trees and one free-standing plaque. All conditions will be returned to existing and will be coordinated with JAMO and the City of Portland.	Sabrina Robinson

Comment ID	Topic	Comment By	Comment	Response	Response By
98716	Social and Neighborhood Resources	Japanese Museum of Oregon (formerly Nikkei Legacy), Lynn Longfellow Fuchigami	· As the Plaza is regularly experienced as a memorial for reflection and to honor the history of a community (community of color), the Bill of Rights and its importance in upholding the rights of this country's citizens and our democracy, the opportunity to experience this will not be possible during construction due to fencing/barrier, noise, dust and vibrations. Regular tours of the Plaza will also be impacted in the same negative way. We ask that efforts are made work with our organization (Japanese American Museum of Oregon) to create/find a new space to interpret this history and the Plaza that includes physical exhibit space in another location and the creation of a virtual reality tour/app. Financial compensation to create, develop and implement this should also be required as well as consideration for financial compensation for loss of revenue from tours of the Plaza during the construction period.	This has been addressed in the FEIS/ROD mitigation section. On-going coordination with JAMO will continue in the Final Design phase.	Shane Phelps
98717	Social and Neighborhood Resources	Japanese Museum of Oregon (formerly Nikkei Legacy), Lynn Longfellow Fuchigami	· As physical damage is anticipated from equipment accessing the south part of the Plaza along with dust and vibrations, the continued corrosion/breakdown of the berm, granite pavers and the infrastructure will put the Plaza at extreme compromise and risk. Restoring only the parts that are included in the access area or adjacent to the construction staging area is not a viable or acceptable solution as it would be nearly impossible (aesthetically or otherwise) to piece together a post construction restoration with the remaining existing parts of the Plaza at the north end. Because of this we would require that the whole Plaza be completely redone to create as closely as possible the original Plaza and its stones with a new infrastructure to support it. This would be done with the input of Scott Murase, son of the original landscape architect that designed the Plaza, and Pete Andrusko, the person that has to date, done all the repairs and serves as our consultant with regards to doing any work to the Plaza. If there is any identified risk to the 13 large feature stones or pavers, we would ask that they be removed and stored during the construction phase.	The SDEIS addresses how impacts are to just the grassy area of the Plaza and will not affect any of the features on the berms or hardscaped areas. The FEIS/ROD mitigation section details mitigation measures related to the Plaza. Coordination with JAMO will continue into the Final Design and Construction phases.	Shane Phelps
98718	Social and Neighborhood Resources	Japanese Museum of Oregon (formerly Nikkei Legacy), Lynn Longfellow Fuchigami	· Signage regarding the Plaza, any interpretive exhibits, directional signs, etc. will be created and put into place and any existing signage will be restored or repaired if displaced or damaged during the construction process.	Comment acknowledged. Measures to address these impacts are included in the FEIS mitigation for Social and Neighborhood Resources.	Shane Phelps
98719	Project Cost	Japanese Museum of Oregon (formerly Nikkei Legacy), Lynn Longfellow Fuchigami	· We ask that all of the above be covered as part of the cost of the project itself.	The mitigation measures contained in the FEIS/ROD addressed mitigation measures related to impacts to the Japanese American Historical Plaza. The County will continue to coordinate closely with JAMO during the Final Design and Construction phases to address impacts to the Plaza.	Steve Drahota
98720	Vegetation, Wildlife and Aquatic Resources	Audubon Society, Bob Sallinger	Light Pollution: We encourage you to ensure that the new bridge adheres to ecologically responsible lighting practices and minimizes light pollution. There is a large body of research looking at the myriad negative impacts of light pollution on fish and wildlife, plants, and a growing body of research on the impact of light pollution on human health. In 2016, the American Medical Association released a lighting recommendations guidance document for cities to address and minimize the potential harmful human and environmental effects of blue-rich white lighting. We urge you to ensure that Burnside Bridge designs adhere to exemplary lighting standards that follow best practices for minimizing blue-rich white light, skyglow and light trespass.	Comment acknowledged. Lighting will adhere to City of Portland illumination guidelines.	Rachel Barksdale
98721	Active Transportation Access Options	Robin Castro	I support the use of stairs and recommend ADA ramps on both sides of the bridge. During a major earthquake event, there will already be limited accessibility to materials and aid for our Disabled Community. Our "Lifeline Bridge" cannot diminish access for those already facing the greatest hurdle post-earthquake. I also hesitate to support an elevator as they may become stuck if the infrastructure is compromised during the event. From my own personal experience, the current stairs on the Burnside Bridge are best described as "creepy." They are unsafe looking, debris is littered everywhere, and nowhere on them does it actually feel like my 1 life is actually safe from imminent threat from whomever feels the need to linger in the pathway. Any choice of right of way needs to highlight safety and security of users as well as ADA accessibility.	Comment acknowledged. As part of the Revised Active Transportation Options Memo included with the SDEIS, the County assessed various connection options on both the west and east sides of the Willamette River. A determination of the exact west approach connection will be made as part of the Final Design phase. For the FEIS / ROD, the Preferred Alternative includes a "Protecting-in-place" approach for the existing City stairway to the Eastbank Esplanade. The Project is committed to not precluding the construction of an independent ramp system for the City to construct, should it choose to do so, in the future.	Steve Drahota
98722	Purpose and Need	Robin Castro	My only major gripe with the document was the remarks that an earthquake resilient bridge will bring in new business to the neighborhood by promoting safety and post-earthquake accessibility for their businesses. If that isn't the unnecessary promotion of capitalism in the midst of a natural disaster, I don't know what is.	To clarify, the document states that the earthquake resilient bridge may increase the attractiveness of the sites in bridge vicinity for potential development and redevelopment. This acknowledges the post-construction features of the areas but provides no forecast of business decisions.	Ewa Tomaszewska

Comment ID	Topic	Comment By	Comment	Response	Response By
98723	Sustainability and Climate Change	Robin Castro	As we know that transportation emissions are our greatest impact on climate change as Oregonians, picking the most eco friendly option is absolutely necessary. In the five years that I've lived in Portland, I have heard much about the possible destruction from our expected Cascadia Subduction Zone event but little have I seen proposals that offer and support the most extensive, seismically safe option! As a user of Burnside Bridge and an Environmental Studies major at Portland State with a background in Geography, I feel I am well suited to comment on this particular DEIS.	Comment acknowledged.	Kelly Carini
98724	Comment noted	Robin Castro	I reviewed the Earthquake Ready Burnside Bridge Draft Environmental Impact Statement and I'm writing to show my support for the Preferred Alternative. I support the selection of the Long-Span Bridge Replacement Option with No Temporary Bridge as this choice provides the greatest seismic resiliency which aligns with the project's view that earthquake resilience is that paramount reason to fix or rebuild the Burnside Bridge. The Preferred Alternative promotes the greatest retention of important trees and park space in the neighboring Waterfront Park and Esplanade areas. This alternative also promotes the most equitable division of the roadway between cyclists and motorists. I appreciate that all viable alternatives increased access for pedestrians and bicyclists as is necessary for any infrastructure improvement in 2021. Again the Preferred Alternative is superior as it increases the bike lane capacity by 50% and mandates one to two bus-only lanes reducing congestion as well as promoting ridership with reduced transit times. I am again favorable to the Preferred Alternative because it eliminated the unnecessary destruction of the Burnside Skatepark and reduced the construction impacts on the Portland Rescue Mission. I also support the choice not construct a temporary bridge as it is a long-term burden for a short-term gain. We have the means to divert traffic and overcome the temporary traffic inconvenience without paying millions of dollars and adding years to our timeline. This time of temporary detours could be used as a catalyst to promote the bus-friendly options in store with a new bridge.	Comment acknowledged.	Shane Phelps
98725	Preferred Alternative	Robin Castro	With the Burnside Bridge seeing 35,000 vehicle trips, and at least 3,000 pedestrian/bike crossings daily, the neighborhood fabric can easily be unglued by unnecessary destruction of historical sites and housing resources as a result of restructuring. As our homeless community is most drastically directly impacted by the temporary impacts of the bridge closure and/or potential collapse of the bridge if not retrofitted or rebuilt, I appreciate the Draft EIS highlighting that so effectively. All built alternatives require acquisition of land and 1-2 retail spaces. As the retail spaces are not essential to the essence of the neighborhood and will not result in permanent retail damage to the businesses, again the Preferred Alternative is ideal as it values a historical community skatepark above a retail shop. All major events that take place at the Waterfront were shown to be moveable and returnable to their original locations post construction again showing that this was a temporary nuisance, not a long-term one.	Comment acknowledged.	Shane Phelps
98726	Preferred Alternative	Robin Castro	We are concerned about the growing number of developments in Portland that do not integrate ecological design principles. Of particular concern are developments situated near waterways or other habitats that tend to concentrate birds. We encourage you to ensure that low Kelvin fixtures are installed and that they are installed with full shields to adequately prevent light trespass into adjacent sensitive terrestrial, riparian and aquatic habitats. This is particularly relevant to the imminent Burnside Bridge project, where poorly designed lighting has the potential to trespass into the Willamette River, which supports Chinook Salmon and other listed and sensitive fish species.	Comment acknowledged. Lighting will adhere to City of Portland illumination guidelines.	Rachel Barksdale
98727	Wetlands and Waters	Audubon Society, Bob Sallinger			

Comment ID	Topic	Comment By	Comment	Response	Response By
98728	Public Services	Audubon Society, Bob Sallinger	<p>We would note that ecologically responsible lighting does not need to conflict in anyway with maintaining adequate lighting to ensure public safety. In fact, over-lighting and misdirected lighting actually reduces public safety by creating glare, uneven illumination, shadows, and an oppressive environment. Achieving safety objectives and setting a standard for ecologically responsible lighting are fully compatible objectives.</p> <p>Best practices in lighting design include:</p> <p>Minimizing or eliminating any and all unnecessary lighting; and Carefully considering overall light levels so as not to overlight the area; and Utilization of smart, tunable, dimmable lighting with motion sensors; and Fully shielding exterior fixtures so that no light is projected above 90 degrees; and Exterior lamps should fall below 3,000 Kelvins or within an S/P ratio range of 1 to 1.2; and Eliminating light trespass, i.e., containing lighting within the area where it is needed.</p>	Thank you for your input. The precise level of lighting will be determined as part of the Final Design phase, and subsequent permits from the City of Portland will be sought based on this analysis.	Steve Drahota
98729	Sustainability and Climate Change	Audubon Society, Bob Sallinger	<p>We note that the matrix in Greenroads Technical Report (https://oohburnsidebridge.blob.core.windows.net/media/Default/DEIS/EQRB-Greenroads-Technical-Report.pdf) indicates that ecological lighting and light pollution were in fact considered and subsequently removed from consideration for credits (see final line of matrix). We would urge Multnomah County to restore this objective.</p>	The precise level of lighting will be determined as part of the Final Design phase, and subsequent permits from the City of Portland will be sought based on this analysis. Multnomah County will assess whether lighting will be considered a Greenroads objective as part of the Final Design phase.	Steve Drahota
98730	Stormwater	Audubon Society, Bob Sallinger	<p>Green Infrastructure/ Sustainable Stormwater Strategies: We strongly encourage the County to utilize green surface stormwater strategies consistent with the Portland Stormwater Manual to the maximum extent possible to address stormwater runoff. Utilizing green infrastructure strategies such as green streets, urban tree canopy, bioswales, etc. provides multiple benefits including reducing urban heat island effects, sequestering CO2, reducing air pollution, providing habitat, and increasing quality of life. The Burnside Bridge project is located in an area of the city that is notable hardened and grey. A project of the size and scope of the Burnside Bridge Project should explore to the maximum extent practicable how to integrate green strategies into this landscape.</p>	Comment addressed in DEIS. Section 3.14.4 lists mitigation techniques to be implemented during design. Section 4 of the Stormwater Technical Report list applicable regulations and design standards that will be followed during design. The project will apply the Portland Stormwater Management Manual hierarchy which includes the potential for various treatment means.	Cory Gieseke
98731	Vegetation, Wildlife and Aquatic Resources	Audubon Society, Bob Sallinger	<p>Habitat Mitigation: To the degree that there are temporary or permanent impacts to fish and wildlife habitat, we strongly encourage the County to fully mitigate for these impacts and to invest the funds downriver in either the Central or North Reach of the Willamette at an existing habitat mitigation bank. The opportunities for mitigation in the immediate vicinity of the Burnside Bridge are extremely limited. Mitigation dollars would best be utilized to support existing habitat restoration projects in the local area. We also strongly urge the County to fully mitigate for any trees that are removed as a result of this project.</p>	Compensatory mitigation is proposed and discussed in the Section 3.16.4 of the DEIS.	Rachel Barksdale
98732	Vegetation, Wildlife and Aquatic Resources	Audubon Society, Bob Sallinger	<p>Wildlife Enhancements: We encourage the County to work with Audubon to consider wildlife enhancements that can be incorporated into the bridge design, most notably the potential for a peregrine falcon nest box. Peregrines nest on several area bridges (Marquam, Fremont, Saint Johns, Interstate 5, Interstate 205). There is a significant potential with some of the proposed bridge designs that peregrines will attempt to nest on the Burnside Bridge as well. Peregrines can provide significant benefits including pigeon and starling control and incredible opportunities for public wildlife watching. As a federally protected species, it is generally preferable to integrate a nest box into the planning process rather than attempting to manage them after they choose a nest location on their own.</p>	Comment Acknowledged. We can discuss this as an option during the final design phase.	Rachel Barksdale
98733	Comment noted	Audubon Society, Bob Sallinger	<p>We appreciate your consideration of these comments.</p>	Comment acknowledged.	Shane Phelps
98734	Preferred Alternative	Jon Wood	<p>I oppose demolishing the Burnside Bridge. I favor amending and strengthening the existing bridge to make it earthquake safe. If the decision is that the current Burnside Bridge must be demolished, I would support replacing the existing bridge with an identical design.</p>	Comment acknowledged. The DEIS identifies the Long-span Replacement Alternative as its preferred alternative.	Shane Phelps
98735	Preferred Alternative	Nick Stockton	<p>First, I would like to state my support for the preferred long-span alternative. The evidence that the bridge would be more structurally sound than both the short-span and the retrofit seems so in line with the project goals of safety and security that it is a clear choice. As an Environmental Science student, I also very much appreciate that fewer bridge piers means less disturbance to the river floor and hopefully less overall scouring.</p>	Comment acknowledged.	Shane Phelps

Comment ID	Topic	Comment By	Comment	Response	Response By
98736	Environmental Justice and Equity	Nick Stockton	My only concern now is the traffic management options. Having looked at the time tradeoffs, I was originally convinced that the preferred no-build option was the right call because it would be very simple for me to detour across another bridge and I often do already, but I have realized that however inconsequential this decision is to me, it may be crucial to the many houseless individuals that live around or on the project site. Particularly those on the east side of the bridge, who would have their travel time to the Portland Rescue Mission doubled or more.	Comment acknowledged. Out of direction travel is addressed in the Environmental Justice Technical Report and DEIS. FEIS transportation mitigation addresses out-of-direction travel associated with the no-temporary bridge option by working with TriMet and social service providers to provide free or subsidized transit passes to those that would be impacted. TriMet and County are committed to continuing coordination during the design and construction phases to help offset these out-of-direction travel impacts for EJ populations.	Eduardo Montejo
98737	Public Involvement	Nick Stockton	I'm not writing to speak for them, because I can't say whether the extension of construction time and noise would be an equivalent tradeoff for a temporary pedestrian bridge, but I am encouraging you to check further with them about this decision. I understand that you have already been discussing these issues with a social services working group and I commend you on your thoroughness, but I suggest rechecking and redoubling your efforts to ensure maximum participation and input with these demographics. Because this project will already cause the displacement of several houseless people that use the bridge as shelter, it is absolutely your responsibility to get the maximum amount of their input possible for these decisions and to give that input its proper weight.	Comment acknowledged, thank you. Mitigation discussions with social service providers will continue throughout the project.	Sabrina Robinson
98641	Purpose and Need	Sandra Strithers	I'm calling to let you know that I am totally and entirely opposed to this project. It is absolutely ridiculous and I'd like to know who's going to be pushing it, who's going to be profiting off it, it's ridiculous. Let's wait and see how the bridge survives an earthquake and if it doesn't then we can redo it then. There's no sense in this project.	Comment acknowledged. The project proponent is Multnomah County. The current bridge is not anticipated to remain fully operational following a major Cascadia Subduction Zone earthquake. The project will create a seismically resilient Burnside Street lifeline crossing of the Willamette River that would remain fully operational and accessible for vehicles and other modes of transportation immediately following a major CSZ earthquake. The beneficiaries of this project are local and regional in that a seismically resilient Burnside Bridge would support the region's ability to provide rapid and reliable emergency response, rescue, and evacuation after a major earthquake, as well as enable post-earthquake economic recovery. In addition to ensuring that the crossing is seismically resilient, the project will also provide a long-term, low-maintenance safe crossing for all users.	Shane Phelps
98642	Archaeological and Historic Resources	Sandra Strithers	Besides the bridge is a historic bridge, it's a main part of Portland people come to see it and admire it. Don't get rid of this historic bridge.	The historic significance of the bridge is unquestionable. Unfortunately, the current bridge would not survive a major earthquake. The Project is designed to ensure a bridge that would survive as a critical lifeline after an earthquake.	David Ellis
98643	NEPA Process	Restore Oregon, Peggy Moretti	We are being asked to endorse the loss of an iconic landmark, and select an option for replacement, with insufficient information to make such a decision. Many critical questions must be answered before taking any further action.	Comment acknowledged.	Shane Phelps
98644	Comment noted	National Parks Service, U.S. Department of the Interior, Allison Hall	The U.S. Department of the Interior (Department) has reviewed the draft Environmental Impact Statement (EIS) and 4(f) evaluation for the Earthquake Ready Burnside Bridge (EQRB) project. The following comments are offered for use in the development of the final EIS for this project.	Comment acknowledged.	Shane Phelps
98645	Sustainability and Climate Change	Restore Oregon, Peggy Moretti	Does that replacement cost estimate include the expense of demolition and disposal of that vast amount of material	The estimate of construction related GHG emissions includes an estimate of demolition-related emissions. The methodology is noted in the technical report and described in FHWA's Infrastructure Carbon Estimator (ICE) 2.0 Manual (page 59).	Kelly Carini
98646	Preferred Alternative	Restore Oregon, Peggy Moretti	It has been stated that an enhanced retrofit of the existing Burnside Bridge would achieve the target level of earthquake safety, through significant modifications to the structure, at approximately 10% more than the cost of replacement...including the cost to the climate? We suspect that, when you factor in the financial and environmental costs of demolition, and the cultural and livability impact of replacing the Burnside Bridge, the difference would be closer to break-even.	A detailed seismic retrofit analysis was performed for the structure, as documented in the Feasibility Study. Based on all information at hand, County decision makers elected to replace the aging bridge with a structure that could reliably withstand the CSZ earthquake, even if it occurred in 100 years.	Steve Drahota
98647	Archaeological and Historic Resources	National Parks Service, U.S. Department of the Interior, Allison Hall	The National Park Service – one of the Department's component bureaus - is actively participating in the National Historic Preservation Act (NHPA) Section 106 consultation for the EQRB project under 36CFR§800.10(c). The Skidmore/Old Town National Historic Landmark (NHL) District falls within the project Area of Potential Effect and the existing overland portion and abutment on the west side of the river is within the boundary of the NHL District. Under Section 110(f) of the National Historic Preservation Act, agencies must undertake planning and actions to the maximum extent possible to minimize harm to National Historic Landmarks.	Coordination with the National Park Service on Project effects to the NHL District has been ongoing and will continue.	David Ellis
98648	Archaeological and Historic Resources	National Parks Service, U.S. Department of the Interior, Allison Hall	The Skidmore/Old Town NHL District is a significant concentration of historic commercial buildings in Portland, Oregon dating to between 1857 and 1929. The NHL District is nationally significant under NHL Criteria 1 as its concentration of buildings embody Portland's commercial, social, and settlement history, including the later history of disadvantaged and house-challenged people of the urban core. It is also significant under Criteria 4 as one of the finest collections of mid- and late-nineteenth-century cast-iron commercial buildings in the Far West.	Comment acknowledged.	David Ellis

Comment ID	Topic	Comment By	Comment	Response	Response By
98649	Sustainability and Climate Change	Restore Oregon, Peggy Moretti	Climate Impact. The climate impact statement in the DEIS only addresses construction emissions. It does not include the tremendous environmental impact of demolishing the old bridge with all its embodied energy and hauling tons of concrete and steel to away to landfill. Yet even without that carbon cost of demolition factored in, the Enhanced Retrofit generates the lowest total emissions of all the alternatives. [insert CO2 study info]	The estimate of construction related GHG emissions includes an estimate of demolition-related emissions. The methodology is noted in the technical report and described in FHWA's Infrastructure Carbon Estimator (ICE) 2.0 Manual (page 59).	Kelly Carini
98650	Archaeological and Historic Resources	National Parks Service, U.S. Department of the Interior, Allison Hall	The Department concurs that the preferred alternative as described in the DEIS could have an adverse impact on the integrity of the Skidmore/Old Town NHL through vibration effects on unreinforced masonry buildings. Adverse effects associated with vibration could compromise the structural and historic integrity of unreinforced brick buildings including, damage or loss of building materials and character defining features for one or more contributing buildings, or even the loss of one or more buildings. Loss of physical features could adversely affect the overall design aesthetic and historic character of the NHL District and the loss of buildings would significantly impact its overall historic integrity. Analysis of potential adverse effects associated with vibration should address not only the potential damage or destruction of individual buildings within the district but also the effects on the NHL District as a whole.	The Project Programmatic Agreement (PA) will establish a rigorous process for assessing the potential for historic URM buildings in the Project area to be affected by Project actions. This would include monitoring during Project-related activities. The PA will also define addressing any adverse effects, including appropriate mitigation measures.	David Ellis
98651	Archaeological and Historic Resources	National Parks Service, U.S. Department of the Interior, Allison Hall	We agree that conducting engineering assessments to better define the vulnerability to vibration damage for individual buildings is needed. We recommend that these assessments are carried out far enough in advance to inform protection measures that will be in place prior to and during project construction. We concur with the proposal to monitor the condition of vulnerable buildings during construction, use equipment that minimizes vibration impact when within one-hundred feet of a historic property of unreinforced masonry construction, work with the City of Portland to find ways to rehabilitate historic buildings, and further document those historic properties vulnerable to vibration impacts prior to the start of construction. For those buildings for which vibration impacts are anticipated and where alternative construction methods are not practical, an appropriate mitigation is the seismic retrofitting of the buildings.	The Project Programmatic Agreement (PA) will establish a rigorous process for assessing the potential for historic URM buildings in the Project area to be affected by Project actions. The PA will also define addressing any adverse effects, including appropriate mitigation measures.	David Ellis
98652	Noise and Vibration	Restore Oregon, Peggy Moretti	In addition to concerns about construction vibration and damage, no consideration has been given to how would a new structure integrate with and enhance or diminish the historic fabric?	Comment acknowledged. No change: Regarding the livability portion of the comment, from a noise perspective the replacement bridge would result in similar noise levels as the existing bridge. Nevertheless, the County and ODOT did analyze noise abatement on the bridge; however, noise abatement was not found to be feasible and reasonable per ODOT policies, therefore it is not included in the project.	Scott Noel
98653	Archaeological and Historic Resources	National Parks Service, U.S. Department of the Interior, Allison Hall	We concur that the Skidmore/Old Town NHL is a 4(f) property. We believe that this property has the highest relative significance of the 4(f) properties and the 4(f) analysis should reflect the relative significance of these resources. Visual design should be assessed for the least overall harm to the NHL district.	The Section 4(f) analysis in the Supplemental DEIS and Final EIS acknowledges potential visual impacts to the NHL and explains that the Refined Long-span Alternative with the girder style bridge on the west end (that does not include a superstructure) would not cause an adverse effect to the NHL. This conclusion is based on the Finding of Effect attached to the Section 4(f) analysis.	Jennifer Hughes
98654	Archaeological and Historic Resources	Restore Oregon, Peggy Moretti	Historic Resources Impact. The impact of the various replacement options on the abutting historic districts on both sides of the river – especially on Skidmore Old Town – has not been assessed or described to the public. The DEIS report section on social-neighborhood impact focuses only on the disruption from construction, not the permanent change to the very fabric and flow of the districts...no consideration has been given to how would a new structure integrate with and enhance or diminish the historic fabric?	Addressed in the SDEIS. The refined girder bridge evaluated in the SDEIS would have less intrusion into Skidmore/Old Town National Historic Landmark District than the Draft EIS Long-span Alternative and would have similar bulk/massing to the existing bridge. Compared to the Draft EIS Long-span, this would avoid a Section 106 adverse effect that would occur with the tied-arch or cable-stayed bridge types.	Jennifer Hughes
98655	Archaeological and Historic Resources	National Parks Service, U.S. Department of the Interior, Allison Hall	The Department does not concur with the 4(f) determination that there is no constructive use of the Skidmore/Old Town NHL as there are not sufficient details on the visual intrusions associated with the preferred alternative. The project could have a constructive use on the Skidmore/Old Town NHL associated with visual impacts related to the preferred long-bridge design. Because the existing bridge is not a part of the NHL District, representing a more recent (although still historic) intrusion, changes to the bridge could affect the setting and feel aspects of integrity for the District. A bridge that is more imposing or much more visible from within the NHL District, like tiered or cable stay designs, could adversely affect the historic character of the district through visual impacts. It appears that the open deck design for the long bridge could have the least visual impact on the NHL District because most of the visual intrusion would be below the bridge deck and would be more consistent with the existing bridge. Please note that this specific comment is addressing potential visual impacts only and does not address any on the ground and construction method differences for the different types of bridges under consideration.	Addressed in the SDEIS and FEIS Section 4(f) attachments. With the Refined Long-span Alternative analysis in the SDEIS and associated Section 4(f) analysis, the visual intrusion of the bridge into the NHL is no longer considered an adverse effect and is not a constructive use under 4(f). The refined design will include a girder style on the west approach with no superstructure.	Jennifer Hughes

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98656	Comment noted	National Parks Service, U.S. Department of the Interior, Allison Hall	For questions or information regarding these comments, please contact Dr. Elaine Jackson-Retondo (elaine_jackson-retondo@nps.gov). If you have any other questions, please do not hesitate to contact me at Allison_O'Brien@ios.doi.gov or (503) 720-1212.	Comment acknowledged.	Shane Phelps
98657	Social and Neighborhood Resources	Restore Oregon, Peggy Moretti	Livability. Other than to acknowledge an impact on the Historic Districts and several other structures, statements regarding adverse impacts have been limited to vibration and temporary closures. But a new bridge and how it connects to the districts on either side will have a tremendous effect on livability within those districts - the flow of street traffic, how pedestrians relate to the scale, move through and engage with businesses and public spaces, and how both residents and visitors are introduced to and perceive the City. This needs MUCH more study and could present a once-in-a-lifetime opportunity to improve livability, connectivity and access within those Districts!	Comment acknowledged, thank you. Addressed in the DEIS Social and Neighborhood Resources Technical Report: discusses the direct and indirect effects of a new bridge in relation to neighborhood cohesion/quality of life and community facilities and social service providers.	Sabrina Robinson
98658	Public Involvement	Restore Oregon, Peggy Moretti	Cultural Heritage Impact. The Burnside Bridge is really The People's Bridge. Its position at the center of the City where the four quadrants meet - its friendliness, walkability, and views are beloved. A lot of Portland history has taken place on this bridge - countless demonstrations and parades and millions of selfies with the White Stag sign in the background. It symbolizes PORTLAND, and the public is largely unaware of its pending loss. The City should cultivate greater transparency of this process by more aggressively alerting the public and seeking public input on the options after their impact has been better assessed. We anticipate a much greater outcry if the City made an effort to increase the visibility of this proposal.	Comment acknowledged, thank you. Addressed in DEIS and FEIS: Public outreach is discussed in Attachment K (Public Involvement and Agency Coordination). Public communication is important and will continue throughout the duration of the project.	Sabrina Robinson
98659	NEPA Process	Restore Oregon, Peggy Moretti	Any decision about IF and HOW to replace the Burnside Bridge is about far more than engineering. Given the importance of the safety, cultural, and economic impact of this decision, we do not have sufficient information to make that call and we urge you demand that a much more comprehensive analysis take place.	Comment acknowledged. The FEIS Preferred Alternative includes consideration of the issues you have listed as detailed in the DEIS and SDEIS and supporting technical reports and memoranda.	Shane Phelps
98660	Sustainability and Climate Change	Hillary Adam	Executive Summary pg. 27 - Climate Change makes no mention of the carbon footprint of demolishing the existing structure, accounting for the loss of its embodied energy, and accounting for the carbon footprint of construction of a new bridge.	The estimate of construction related GHG emissions includes an estimate of demolition-related emissions. The methodology is noted in the technical report and described in FHWA's Infrastructure Carbon Estimator (ICE) 2.0 Manual (page 59).	Kelly Carini
98661	Archaeological and Historic Resources	Hillary Adam	Pg. 28 - Historic Resources - It is not accurate to say that there would be no impact to the Skidmore/Old Town historic district. Removal of the bridge and the creation of a 2' gap between the bridge and adjacent buildings changes the relationship between these structures, therefore, there is some impact - a minimal impact - but not "no impact".	Section 3.11.2 of the SDEIS states the Project would have "no adverse effect" to the historic properties in the Skidmore/Old Town NHLD.	David Ellis
98662	Archaeological and Historic Resources	Hillary Adam	Removal of the multitude of columns under the bridge also constitutes an impact within the historic district - potentially a positive impact.	Comment acknowledged.	David Ellis
98663	Archaeological and Historic Resources	Hillary Adam	Also, until the Bridge Type Selection is made and unless it is decided that the west approach will be a girder, it cannot be said that the future bridge will have no impact on the district, either physically or visually. A visual impact is an impact. The visual change of a truss, tied-arch, or cable-stayed bridge at the west approach, within the historic district would constitute a significant impact to the setting and feeling of the district.	The SDEIS describes that the west approach will be a girder style bridge.	David Ellis
98664	Archaeological and Historic Resources	Hillary Adam	Please also note the RJ Templeton building is a landmark and its relationship with the bridge will change with a new bridge, constituting an impact, even if minimal.	The relationship with the bridge was described and the determination was revised to "no adverse effect" in Section 3.11.2 of the Supplemental Draft EIS.	David Ellis
98665	Sustainability and Climate Change	Hillary Adam	Ch. 3 Climate Change Pg. 19 - It is not clear that the GHG emission totals for all of the Build options include the GHG emissions for demolition of the existing bridge. Is that clearly stated? It is not clear if the embodied energy of the existing bridge is accounted for either its retention in the No Build alternative or its loss in any of the Build Alternatives.	The estimate of construction related GHG emissions includes an estimate of demolition-related emissions. The methodology is noted in the technical report and described in FHWA's Infrastructure Carbon Estimator (ICE) 2.0 Manual (page 59).	Kelly Carini
98666	Archaeological and Historic Resources	Hillary Adam	Ch.3 Cultural Resources Pg. 3 - 7.2.1 - notes that all of the build alternatives will likely create vibrations that could impact URMs, stating that 9 of these are within 100 feet of Burnside and within the district. It states that vibration impacts could cause damage that would constitute Adverse Effects. Mitigation, in the form of seismic upgrades, should be provided to these buildings to ensure no Adverse Effects from vibration and to ensure that they will not impede traffic through their collapse in the event of a significant earthquake.	The Project's Programmatic Agreement defines a rigorous protocol to further analyze the potential vibration and other demolition/construction effects to historic URM buildings. Mitigation measures will be implemented to address any possible impacts.	David Ellis
98667	Archaeological and Historic Resources	Hillary Adam	Pg. 105 - add "and City Council, respectively" after "Historic Landmarks Commission" in the 3rd paragraph.	The County will meet all City requirements for addressing Project effects to historic resources.	David Ellis

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98668	Archaeological and Historic Resources	Hillary Adam	Pg 107-109 – URM along Burnside should be identified for priority seismic upgrade in order to ensure Burnside would remain clear of debris in the event of a significant earthquake. Priority buildings may include: 4 – Salvation army Building at 134 W Burnside, 11 – Holm Hotel at 8-11 SW 2nd Ave, 15 – Wax Building at 219 W Burnside, 33 – Bates Building at 101-117 W Burnside, and 34 – Burnside Hotel at 2-12 NW 2nd Ave, as identified on pp. 108-109.	The Project's Programmatic Agreement defines a rigorous protocol to further analyze the potential vibration and other demolition/construction effects to historic URM buildings. Mitigation measures will be implemented to address any possible impacts.	David Ellis
98669	Archaeological and Historic Resources	Hillary Adam	Pg. 123 – 8.3 – Rather than stating that "funding is potentially available", establish a funding mechanism to ensure seismic upgrades to URM along Burnside. Pursue FEMA money to partner with adjacent property owners to seismically retrofit their URMs prior to bridge demolition and construction.	The Project's Programmatic Agreement defines a rigorous protocol to further analyze the potential vibration and other demolition/construction effects to historic URM buildings. Mitigation measures will be implemented to address any possible impacts, which could include seismic retrofitting.	David Ellis
98670	Archaeological and Historic Resources	Hillary Adam	Pg. 123 – 8.4 – Ensuring the White Stag Sign's ability to endure a significant earthquake should be considered as a mitigation measure, not just during construction.	Mitigation measures are typically related directly to adverse effects to historic properties. As no adverse effects to the White Stag Sign from the Burnside Bridge Project have been identified, addressing the ability of the Sign to survive an earthquake is not directly related to the Project.	David Ellis
98671	Visual and Aesthetic Resources	Hillary Adam	Ch. 3 Visual Resources Pg. 47 – 6.1 – Tables 1, 2, and 3 – The matrixes and preceding paragraphs do not consider a girder among the long-span alternatives at the west approach. This should be included as it is a preferred choice among some groups and would likely register as a low-impact option. If the girder is implied to have the same impacts as the Short-Span or Couch Extension examples, this should be clearly stated.	Addressed in SDEIS.	Josh Carlson
98672	Visual and Aesthetic Resources	Hillary Adam	Pg. 115 – 7.1 – Every effort should be made to avoid removal of the cherry trees north of the bridge. If cherry trees within this grove must be removed, they should be replaced with similarly scaled trees as the consistency of scale of these trees is critical to the visual qualities of this landscape.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Josh Carlson
98673	Construction Methods	Adam Greek	Is there any plan in place for what should happen if there were an earthquake during the construction process?	Unfortunately, a partially demolished / constructed bridge is very vulnerable to an earthquake, and it is quite likely that the bridge would collapse in that scenario. There are no reasonable provisions to make the bridge resilient until the entire EQRB project is complete.	Steve Drahota
98674	Comment noted	Keith Jones	Friends of Green Loop is please to submit comments on the "Earthquake-Ready Burnside Bridge" DEIS. This replacement project presents many opportunities for a signature, highly visible and multifunctional crossing of the Willamette River. There is much in the project that we support, so we wanted to focus our comments on elements of the project that could be improved or where other ideas may be helpful. We wanted to focus our comments on 'provisions for bicycle and pedestrian access during construction.'	Comment acknowledged.	Shane Phelps
98675-1	NEPA Process	James Heuer	In my detailed review of the alternatives presented in the DEIS, a critical weakness of the analysis stands out in that the solutions each apply a single unified approach to the entire bridge even though the narrative refers in several places to the possibility of "hybrid" solutions. Accordingly I urge the team to break up the problem into its three constituent parts. The Portland Historic Landmarks Commission members have suggested as much as well in their comments where they were concerned with the impacts on historic resources – but the larger issues of impacts on the urban cityscape lead us to this conclusion as well. Three bridge segments, three separate sets of issues: West approach: a. Gloomy underutilized spaces under the bridge interrupted by multiple concrete pylons b. Open, unobstructed views from bridge walkways prized by Portland walkers and bikers c. Close proximity to historic buildings threatens both bridge and buildings when shaking starts... e. Approach structure is not included in National Register of Historic Places listing, thereby offering greater flexibility – but impacts remain on adjacent NRHP listed structures. f. Multiple poorly reinforced concrete supports risk collapse during seismic event. Main Bridge: a. 781-foot expanse is listed on the National Register of Historic Places both for engineering and for the artistic expression of the bascule towers, railings, and center span configuration (Criteria A and C). Also recognized is the role the bridge has played in civic events, not least of which was the Black Lives Matter demonstration in 2020. b. Existing piers need to be reinforced, but all new bridge designs require new piers in roughly the same places due to need for a low level bridge that can open for the ship channel. c. Open truss support under the deck for the near ends provides visual interest, calling attention to the steel construction (emblematic of the early 20th Century) and keeping sight lines open for the entire length of the main bridge... (continued in 98675-2)	Each of the three segments of the bridge (west approach, middle span, and east approach) were analyzed within the context of the Area of Potential Impact appropriate to each of the environmental resources. The preferred alternative selected in the FEIS considers the impacts of the bridge both in terms of its constituent parts as well as holistically.	Shane Phelps

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98675-2	NEPA Process	James Heuer	(continued from 98675-1) East approach: a. Covers the greatest expanse of land subject to liquefaction of the bridge complex b. Approach structure is not included in the National Register of Historic Places listing. c. A single span across this area without supports in unstable ground requires structural components above the bridge surface – suspension, arches, or trusses. d. Close proximity to historic buildings threatens both bridge and buildings when shaking starts. e. Currently unobstructed sight lines continue on the east side of the bridge.... The dramatic disparities in the issues and concerns of these three sections suggest a composite set of solutions that appropriately address each section even at the expense of a shift of design vocabulary across the total length of the span. It is time to rethink the approach to identifying solutions and to include social, cultural, and historic preservation considerations more fully. Given the relatively small economic differences among the alternatives presented – differences much smaller than the uncertainty range in the estimates, there is no fiscal irresponsibility in re-considering the weightings – moving away from monolithic solutions that imperfectly address issues across the bridge and toward more tailored solutions that may add up in the end to a lower cost, shorter duration solution.	Each of the three segments of the bridge (west approach, middle span, and east approach) were analyzed within the context of the Area of Potential Impact appropriate to each of the environmental resources. The preferred alternative selected in the FEIS considers the impacts of the bridge both in terms of its constituent parts as well as holistically.	Shane Phelps
98677	Transportation - Short term bike, ped & ADA	Keith Jones	We recognize that a project of this scale without a temporary replacement bridge will require closure of key routes and necessitate detours for all transportation modes. That being said, there appear to be inequitable construction impacts to different transportation modes. For vehicles, there are goals for very restricted closures of the I-5 Freeway -- limited to nights, weekends, etc. In contrast, multi-year closures roughly from 1 – 3 years depending on the selected project, are being considered for critical and accessible active transportation corridors like the Vera Katz Eastbank Esplanade. In general, impacts to the various transportation facilities in the affected area should reflect an equitable approach.	Comment acknowledged. A series of assumptions about the construction approach have been included in the SDEIS. For further details, please see the Revised Constructability Technical Report included with the SDEIS.	Lewis Kelley
98678	Transportation - Short term bike, ped & ADA	Keith Jones	Given the likelihood of some closures and required detours, the project should provide for safe and convenient alternate routes around the Burnside Bridge and its affected bridgehead areas. The Green Loop presents an alternative north-south route on the east and west sides of the river, allowing walkers, joggers rollers and cyclists opportunities to navigate the bridge area and make connections cut off by the construction project.	Addressed in FEIS Mitigation section. A list of mitigations has been developed in coordination with the City, TriMet, ODOT and other partners that includes active transportation detours and improvements along active transportation routes to increase comfort and safety. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
98679	Transportation - Short term bike, ped & ADA	Keith Jones	The position of the I-5 Freeway and the Union Pacific Railroad limit alternate routes on the east side more than the west side. In Central Eastside, ped/bike traffic should be directed east from the Eastbank Esplanade to the Green Loop on SE 6th using SE Salmon. The project should improve the street per the Bureau of Transportation's "Central City in Motion" (CCIM) plan, including two new signals at Salmon and MLK/Grand. Heading north, crossing improvements will be needed at busier streets along 6th Avenue to the Earl Blumenauer Bridge, which will be open by the time the project starts. In Lloyd, NE 7th in Lloyd should be improved per the CCIM, at least to NE Holladay where traffic could be temporarily removed to allow direct access to the Steel Bridge.	Addressed in FEIS Mitigation section. A list of mitigations has been developed in coordination with the City, TriMet, ODOT and other partners that includes active transportation detours and improvements along active transportation routes to increase comfort and safety. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
98680	Social and Neighborhood Resources	Keith Jones	Finally, any impacts to, or closures of, the Burnside Skatepark should be minimized. The project should mitigate any impacts to the skatepark by building a new (or temporary, while the Burnside park is closed) park at a location acceptable to the skateboarding community. Skateboarding is an example of an active transportation mode that encourages trips that help the region reduce its overall carbon emissions. Skateboarding, and by extension the skatepark, reflect a sport that is very accessible to people from all types of demographics and backgrounds. The unique character of the skatepark creates a draw for a diverse, younger community of people to the Central City which is consistent with the vision of the Green Loop and difficult to replicate. We support not only skateboarding as an active transportation mode, but also the recreational facility the skatepark presents.	Comment acknowledged, thank you. The refined alternative keeps the skatepark intact and minimizes construction closures.	Sabrina Robinson
98681	Comment noted	Keith Jones	We would like to thank the project team for the opportunity to comment, and we look forward to how these issues will be addressed in future iterations of the project's design. Please feel free to reach out with any questions – we would be happy to discuss any of these comments further.	Comment acknowledged.	Shane Phelps
98683	Economics	James Heuer	Thank you for your consideration. West approach: d. Disconnect between major arterial (Burnside) and 1st and Naito Parkways inhibits development in this historic but fragile part of downtown, suggesting benefits from re-thinking the height and grade of the west approach to reintegrate with the street grid.	The County commits to continuing coordination with the City in advance of, as well as during, the Final Design phase to address this issue.	Ewa Tomaszewska

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98689	Preferred Alternative	James Heuer	Main Bridge: d. Technology is available to reinforce this main bridge and rebuild key components to extend its life for another 100 years. Given the expectation of replacing most mechanical components of the bascule, projections of greater maintenance for a retrofit solution are not credible.	The extensive retrofitting required to achieve the project's seismic design criteria for the nearly 100-year old Burnside Bridge adds substantial costs to construction. This is largely because it was never designed for any amount of earthquake loadings when originally designed. In fact, the Enhanced Seismic Retrofit would result in the second highest construction cost of all the build alternatives, a higher cost than a new bridge in several cases. In addition, given the age of the bridge and the need to have a service life for another 100 years, the long term maintenance costs for the Enhanced Seismic Retrofit would far exceed those of the replacement alternatives, making the Enhanced Seismic Retrofit the highest life cycle cost alternative.	Shane Phelps
98690	Transportation - Long term bike, ped & ADA	James Heuer	Main Bridge: e. Opportunities for greater deck width may exist by expanding bridge decking with lighter materials for pedestrians and bicycles.	Comment acknowledged.	Lewis Kelley
98695	Cumulative Impacts	James Heuer	East approach: f. Current proposals include no consideration to possibilities for relocation of I-5 and/or the UPRR tracks in the estimated 100 year lifespan of the rebuilt or replaced bridge.	Much of the analysis with regard to long-range planning was based upon regional and local land use plans including the City of Portland 2035 Comprehensive Plan, Central City 2035 Plan, the Metro 2040 Growth Concept and the Metro 2018 Regional Transportation Plan and Regional Framework Plan. Activities that were not included as future local or regional plans are not available for analysis within this EIS process.	Shane Phelps
98696	Transportation - Long term traffic, freight & transit	James Heuer	East approach: g. No opportunities for better integration with the street grid, unless Couch Street extension were built.	Comment acknowledged. The Couch Street extension was considered in the alternatives selection process and removed from consideration for a number of reasons including cost of property acquisition, overall project costs, and increased impacts to natural resources.	Adrian Witte
98697	Visual and Aesthetic Resources	Stephanie Donovan-Brown	I have concerns about views of the White Stag/Portland, Oregon sign being obstructed by a new bridge structure, and hope this possibility will be taken into consideration during the design process. The sign is one of the few landmark icons in Portland's downtown that even people from out of state recognize as representing our city. If we're going to lose a landmark bridge, let's not also sacrifice the sightlines that make views of this one-of-a-kind historic sign possible from multiple directions.	Comment acknowledged. Refer to Revised Visual Resources Technical Report for views of the Preferred Alternative. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Josh Carlson
98698	Purpose and Need	Ted Hendryx	First of all, we would like to thank Multnomah County and HDR Inc. for engaging in this vital project. Geological history dictates a one in three chance of a major earthquake in the next 50 years disabling most of the bridges in Portland, including the existing Burnside Bridge. After the big quake people will require emergency services and families will need to be reunited. The area will depend on the ERBB to cross the Willamette. As a region, we really have no choice but to find the best alternative for replacement ensuring the bridge will stand after a major quake.	Comment acknowledged.	Shane Phelps
98699	Preferred Alternative	Ted Hendryx	The four alternatives have been reviewed while taking into consideration the EIS. The long span which is the preferred alternative as noted in the report makes sense based on the number of pillars and touchpoints on the ground in comparison to the short span alternative. The cost to build and long term maintenance of the long span bridge make it a preferred alternative.	Comment acknowledged.	Shane Phelps
98700	Acquisitions and Relocations	Ted Hendryx	Unfortunately, PCF sits very near the Burnside Bridge on both the south and north side of the bridge. Again we are in favor of the replacement and deem it essential for the region. Our concerns arise out of the actual construction process. PCF is a 24/7 operation. With over 50 trucks domiciled at this location and one way in and out for delivery vehicles, the constant flow of traffic on 2nd Avenue is essential for efficient work flow. The three major alternative retrofit, short span and long span all show about 50% of the south end of the PCF building being used as staging. Given the complexities of the work performed inside of the building and the space utilized even as volume is down based on the pandemic, the work cannot be compressed into the north half of the building.	Unfortunately, given the level of design performed at this time, access from both sides of the bridge will be necessary to construct the infrastructure needed on the east side of the river between PCF and AMR. The County commits to continuing this coordination with PCF as part of the Final Design phase.	Patricia Thayer
98701	Comment noted	Ted Hendryx	All bridge replacement options show the building on the south side of the bridge (AMR) and PCF on the northside are in the needed right of way for supply and construction staging. Is it possible to stage from one side of the new bridge or the other and therefore only displace one and not both buildings? We look forward to engaging in ongoing conversations to find solutions to the challenges mentioned. Thanks for the opportunity to share my perspective.	Comment acknowledged.	Shane Phelps

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98702	Comment noted	Kurtis Fusaro	Thank you for the opportunity to comment on the Draft EIS for the Earthquake Ready Burnside Bridge project. The Green Cities Company owns a building at the corner of Burnside and SE MLK Blvd called 5 MLK. The building contains 220 apartment units, 120,000 square feet of office, and 14,000 square feet of retail. We have several comments and questions on the Draft EIS we would like to share.	Comment acknowledged.	Shane Phelps
98703	Land Use	Kurtis Fusaro	Please note that the site of our building is shown as "Vacant" on "Figure 3.4-1 Existing Land Use" in Chapter 3 of the EIS when the building has been completed and is occupied.	Addressed in FEIS.	Sabrina Robinson
98704	Acquisitions and Relocations	Kurtis Fusaro	5 MLK has a shared bike room for all residents and office tenants which is accessed from Burnside between MLK and SE Third Avenue. There was some talk about construction impacts on Burnside between MLK and SE Third Ave. Can you confirm access to our bike room will be maintained throughout the project?	The County cannot confirm that access to the bike room will be maintained at all times during the construction phase. However, the County commits to continuing this coordination with the 5 MLK as part of the Final Design phase in an attempt to minimize disruptions and access issues to that room.	Patricia Thayer
98705	Acquisitions and Relocations	Kurtis Fusaro	5 MLK has a parking garage entry/exit on SE Third Ave. Can you confirm access to this garage entry/exit will be maintained during the bridge construction?	The County cannot confirm that access to the garage entry/exit will be maintained at all times during the construction phase. However, the County commits to continuing this coordination with the 5 MLK as part of the Final Design phase in an attempt to minimize disruptions and access issues to that space.	Patricia Thayer
98706	Acquisitions and Relocations	Kurtis Fusaro	Our company also subleases a surface parking lot under the Burnside Bridge on SE Third Avenue (next to the skatepark). This lot is shown as "Vacant" in Figure 3.4-1, when it is actively used as a parking lot. We would like to understand the timing of impacts to this lot and whether the lot continue to be a parking lot after construction is complete.	The County is anticipating that this parking space will not be available during construction, and access will be eliminated due to the new construction. As such, it is anticipated that this parking area will be permanently displaced once the project construction phase begins.	Patricia Thayer
98707	Visual and Aesthetic Resources	Kurtis Fusaro	We would like to better understand the view impact from 5 MLK of the different bridge types. Are renderings available of the view of the bridge from our location?	Refer to the Visual Resources Technical Report, Figure 36, "Visual Impacts - View from East Side high-rise looking west" is taken from The Yard building directly across Burnside St. Views will be similar from 5 MLK.	Josh Carlson
98708	Purpose and Need	Kurtis Fusaro	Thank you for the detailed analysis included in this EIS. We appreciate the benefits this project will provide in creating an earthquake-resilient lifeline across the Willamette. We look forward to discussing the project further.	Comment acknowledged.	Shane Phelps
98385	Preferred Alternative	Mark Mulder	After reviewing the EIS related information provided through the EIS Burnside Bridge website, I would like to provide the following comments: Even with the merits of the present crossing proposals of the EQRB project, a consideration of the multiple financial challenges that the city and county face, and will face in the coming years, suggests that perhaps a more modest and flexible approach to crossing the Willamette after an earthquake event is called for (at least in the near-term). A floating span(s), maintained and stored by the Oregon National Guard, could be deployed and at a cost that would rival (or even be lower than) the \$90 million estimated for the temporary span mentioned in the permanent span proposal. Approaches for the floating span might be "pre-prepared" at various locations on the banks of the river. No permanent structure, even the new proposed structure, could be guaranteed to survive without some damage, interfering with its use immediately after an earthquake event. A military style, quick deployment crossing, stored in the vicinity, would certainly survive the event and at a fraction of the cost. Additionally, such a crossing device will provide near-term crossing solutions implementable within years, rather than decades. A single example of a military type bridging system: General Dynamics has developed an "Improved Ribbon Bridge," (https://www.army-technology.com/projects/improved-ribbon-bridge-irb/) As an additional option to a military style bridging system, a "floating river front" (a sturdier version of the East-bank Esplanade) could be installed, which (without requiring on-bank storage as would be required with the military style bridging system) could be detached, and floated into position across the river with a minimum of logistical effort. An added benefit, would be the recreational enhancement of the Portland waterfront (in its non-bridge configuration). A single example of a floating component system: (https://combifloat.com/application/floating-bridge/)	Comment acknowledged. During the Feasibility Study, the project considered the potential to use temporary floating bridges after a major seismic event. Unfortunately a floating bridge could not be deployed or sustained for weeks after a major CSZ event. Landslides will cause massive volumes of mud, trees and other debris to fill the river, as well as the collapse of built infrastructure on and adjacent to the river. In addition, access to the river level by fire trucks, ambulances, and other vehicles necessary for emergency response, evacuation and recovery, would be extremely difficult if not impossible.	Shane Phelps
98381	Acquisitions and Relocations	Lili Ristagno	My opinion is that everything effort should be made to preserve the skate park.	Thank you for your input. Efforts are being made to minimize impacts to the skatepark during and following the construction phase.	Patricia Thayer

Comment ID	Topic	Comment By	Comment	Response	Response By
			<p>Section 3.1.3 Full Closure refers to detours for bicycles (text page 3-24, Figures 3.1-8 through 3.1-11) that would need improvement in order to be safe and convenient.</p> <p>One detour that needs particular attention is the westbound bicycle route over the Morrison Bridge. Currently, there is no safe, direct route to connect to the SW street grid for people bicycling west or north. Westbound cyclists are now directed to take the sidewalk on the ramp to Naito & Morrison, which is a long out-of-direction route for those heading west or north, especially since Morrison is not a good cycling route because of the MAX tracks and persistent double parking in front of the Nines Hotel.</p> <p>Because of the inadequacy of this routing, many westbound cyclists ignore the signs and continue on the Alder ramp sidewalk to the intersection of SW Alder & 2nd, where they then join 2nd Ave to go north and connect to westbound streets including Washington and Oak.</p> <p>If this project directs cyclists to the Morrison Bridge, improvements must be made to the westside landing.</p> <p>One option would be to improve the Alder ramp (using the sidewalk and a protected lane on the road surface) to accommodate the increased demand by detoured cyclists and pedestrians. Improvements, probably including bicycle signals, would also be needed to safely connect cyclists from the end of the Alder bridge ramp to northbound 2nd Ave, because of the existing right turn lanes from 2nd on to the Morrison Bridge.</p>		
98382	Transportation - Short term bike, ped & ADA	Andrew Holtz	Without improvements, the detour route will likely send cyclists into hazardous confrontations with drivers heading on to the eastbound Morrison Bridge.	Addressed in FEIS Mitigation section. A list of mitigations has been developed in coordination with the City, TriMet, ODOT and other partners that includes active transportation detours and improvements along active transportation routes to increase comfort and safety. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Lewis Kelley
98383	Acquisitions and Relocations	Lisa Hamel	<p>My comments are in regards to mitigating the impact of this project on the currently existing Markets in the Old Town area.</p> <p>I am the owner/operator of Ankeny Market Place. This market is located on the NW corner of 1st and Ankeny. The space Ankeny Market Place occupies is within the affected impact area of this project. I understand efforts will be in place for the future relocation of the Portland Saturday Market along with Ankeny Market Place during the construction phase of this project. I also understand that there is an effort to acquire this property through lease or purchase to use as a staging area during construction and or to incorporate into the overall design of the project. If this property is purchased by the county I would like to request the ability to lease the property on the weekends after the project has been completed. I realize a decision on purchasing the property will not be made until after the design phase has been completed next year, but I would like my intentions for the future use of this location to be known now. I know there is compensation in place for permanent displacement of tenants, but my desire is not to be compensated, it its to continue my business into the future.</p> <p>Relocating these markets in during the construction phase will be challenging. Below are factors I would like you to take into consideration when choosing a temporary relocation space. I'm sure there are many more that come to mind as time goes on.</p> <p>Close to light rail and Waterfront park.</p> <p>Close to parking lots and or parking garages</p> <p>Easy access to downtown Portland via walking or transit.</p> <p>As little automobile traffic as possible.</p> <p>High visible to surrounding areas.</p>	Thank you for your input. Multiple factors will be considered as relocations are contemplated for the Project, in accordance with the Uniform Act.	Patricia Thayer
98384	Economics	Lisa Hamel	<p>The location of Ankeny Market is adjacent to Saturday Market.</p> <p>These Markets have brought millions of dollars to Portland and helped transform the Old Town district over the last 35 years. These Markets are one of the top tourist draws for Portland in the spring and summer months. The public sees these markets as one and has no real awareness to the contrary. The markets together have helped to build the clientele that has existed over the passed several decades(2020 excluded). To separate them would impact the overall benefits to the markets and affect all the small businesses involved in vending in both markets.</p>	The analysis presented was intended to cover all activities around the bridge that may be commonly identified as Portland Saturday Market. A footnote has been added to clarify a broader understanding of the term Portland Saturday Market (and thus impacts to vendors) and is included in the DEIS errata Section 3.5.3.	Ewa Tomaszewska