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

Attachment B

Supplementary 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 idomas, llame al 503-988-5970 o envíe un correo electronico a burnsidebridge@multco.us.

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U.S. Department of Transportation
Federal Highway Administration

Multnomah County

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Comment ID	Topic	Comment By	Comment	Response	Response By
109944	Visual and Aesthetic Resources	Sam Zentner	In analyzing the compatibly of alternatives to the West, Mid, and East approaches, addressing how the current architectural aesthetics work with alternatives was well done. Firm establishment of the aesthetics and design decision making of the development of each approach was clear and detailed. In terms of the West Approach, as the Burnside Bridge is recognized as historic through its addition to the National Register of Historic Places with Italian Renaissance style towers (the only above-deck structures obstructing views) a girder bridge design which keeps the low profile of the bridge, doesn't add any above-deck structures maintaining the current aesthetics, historic surrounding aesthetics, and does not further impede views seems appropriate.	Comment acknowledged.	Josh Carlson
109945	Visual and Aesthetic Resources	Sam Zentner	The East Approach analysis addresses the changing visual character of newer, modern architecture of the area of which the cable stayed or tied arch will be compatible with the current stylings. Both have similar analysis outcomes in that they diverge from the current aesthetics greatly, will add a large structure above-deck, but may have aesthetic compatibility with East development. With the girder bridge and bascule designs being the clear appropriate choice for maintaining visual compatibility and the similar outcomes of analysis for the cable-stayed and tied arch designs, the main aesthetic analysis should, at this point, be focused on the differentiation between the cable-stayed and tied-arch structures on the East Approach.	Comment acknowledged.	Josh Carlson
109946	Visual and Aesthetic Resources	Sam Zentner	The main visual character compatibly difference identified in the analysis between the two is in the project materials — moderate vs moderate/high impacts. However I was unable to determine the project materials of each alternative and how they would contrast with the aesthetics or material choices of the East's development. Solidifying the material choices could aid in differential analysis.	Selection of materials will also be finalized during the Final Design phase.	Josh Carlson
109947	Visual and Aesthetic Resources	Sam Zentner	Both tied and cable alternatives contrast with the visual character of the Project Environment, yet do not contrast with the character of the East Approach. With this, how the alternatives aesthetics enhance or detract from the developments within the East should be considered. As development in the East has increased building height, subsequently narrowing views, and reducing visual transparency, how the cable stayed or tied arch designs contribute or compare to this visual narrowness should be considered.	Within the FHWA Guidelines that the report is written, many of the urban design comments you mention were not covered. These will also continue to be studied during Final Design.	Josh Carlson
109948	Visual and Aesthetic Resources	Sam Zentner	Another analysis that may contribute to differentiation is the analysis of transition. With a west girder, mid bascule, and east cable or arch, the bridge will act as a literal visual bridge of aesthetics between the west's historic and east's modern styles. Understanding how these aesthetics merge into one another and how they affect visual and aesthetic perceptions is necessary. Progression from the west's flat girder to the east approach is potentially more visually gradual with cable stayed and more abrupt with tied arch.	Visual transition will continue to be studied in the Final Design phase of the project.	Josh Carlson
109949	Visual and Aesthetic Resources	Sam Zentner	Further analysis on the Burnside Bridge's aesthetic compatibility with the Steel Bridge, Morrison Bridge, and overall bridges of the Willamette could also benefit decision making. While the Outlined Area of Visual Affect includes the immediately adjacent bridges (Steel, Morrison) which create a visual barrier to the landscape beyond, the entirety of Willamette bridge crossings in the City could be considered as in total, they add to the visual aesthetics of the City, which may be outside the scope of this EIS, but should it be? For example, a cable-stayed design may aid in a sense of visual coherence across the City's bridges in matching the aesthetics of newer builds like the Tilikum Crossing Bridge, while the girder bridge will maintain coherence will older bridges, and the tied arch style may be more visually compatible with immediately adjacent bridges.	Visual contribution or detraction, and cohesive design among all city bridges will continue to be studied in the Final Design phase of the project.	Josh Carlson
109950	Visual and Aesthetic Resources	Sam Zentner	Quantifying how visuals will affect various viewer groups like neighbors and travelers through the viewer sensitivity analysis was detailed and took into consideration a large variety of affected stakeholders and how they are affected in terms of proximity, extent, duration, and protection for each alternative. With the analysis, it's clear that viewer groups, especially neighbors, generally dislike change and prefer keeping cultural order and project coherence. However, East Approach Residential Neighbors may be more open to change like that which is currently developing. All neighbors prefer high visibility so analysis on the visual transparency of the two alternatives may be fit.	Comment acknowledged.	Josh Carlson
109951	Visual and Aesthetic Resources	Sam Zentner	Overall the aesthetic analysis firmly established current aesthetics, alternative's aesthetic compatibility, affected parties, and overall visual coherence of the project. The preferred alternative could be further analyzed through visual transition, material choice, developmental visual contribution or detraction, and cohesive design among all city bridges, to better differentiate between a cable-stayed or tied-arch design.	The items you listed (visual transition, material choice, developmental visual contribution or detraction, and cohesive design among all city bridges) will continue to be studied in the Final Design phase of the project.	Josh Carlson

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110017	Public Involvement	Jacob Storm	Why is Meaningful Public Participation Important? As a planning student, I have come to truly value and appreciate participatory processes as someone who strongly feels that planning must come from the communities the plans are meant to serve. Involving the public is important for several reasons. In a democratic society, public involvement is a constitutional right and undoubtedly leads to more sustainable, resilient, responsive, and representative places for its inhabitants when implemented properly. It does this by ensuring that decision-makers have more information, more perspectives, better including local expert knowledge, and allows deliberation between stakeholders and decision makers to achieve greater mutual understanding. Perhaps most importantly, it identifies problems that are not seen from technocratic perspectives, can work to solve them, and this process can improve capacity to solve problems moving forward. 1 The location of this project in a very urbanized area with a highly diverse population and extremely complex problems only magnifies the need for meaningful public participation to respond to this great amount of diversity and multitude of issues. Particularly, the high quantity of unhoused residents and social services organizations which these populations depend on at the west end of the bridge is one of the defining local contexts of this area. Given this, participation must respond to this local context to ensure the project will plan for the effects that construction of the project has on these residents, as well as how the resulting project ultimately responds to the needs of these populations. Upon review of the SDEIS and supporting documents, I do believe that outreach was extremely comprehensive and thoughtful. However, I wanted to share a few gaps that I have identified in engagement, what literature promotes as important to achieving more meaningful engagement, and recommendations moving forward to alleviate these concerns and potential outcomes that could come from implementing these recommendations.	Comment acknowledged.	Jennifer Hughes
110018	Public Involvement	Jacob Storm	Recommendations for Improvement Recommendation 1: Public input into action Importance In reviewing literature, one thing I found to promote meaningful engagement was a need for clear expectations, standards, and processes for federal agencies in incorporating public input into federal actions. Doing so fosters a sense of decision-making power in the public as they are able to see their input in action.2 Building off of this, successful engagement requires stakeholders not only to participate, but to clearly shape decisions and outcomes.3 Lastly, a shared commitment to the engagement process by all stakeholders involved is critical to success of engagement and mends and builds trust and willingness to participate.4 These three things, clear incorporation of input into federal actions, the ability to shape decisions and outcomes, and a shared commitment to the engagement process, promote a sense of power and further willingness to participate in future engagement opportunities.	Comment acknowledged..	Jennifer Hughes
110019	Public Involvement	Jacob Storm	How the SDEIS Falls Short Currently, input from stakeholders is spread across several documents. Attachment K: Summary of Public Involvement and Agency Coordination does well to summarize feedback heard across engagement phases. There was not, however, a centralized location that described how the summarized feedback informed the conception of alternatives. The formatting of documents like Chapter 2: Project Alternatives and Attachment J: Potential Mitigation Measures for Short Term and Long-Term Impacts include or address some of the issues or concerns that were heard through engagement, however it is formatted in a way that requires the viewer to search the document without any guidance to find out how the alternative responds to their concern or interest. I suspect that internal conversations among project task groups and committees informed conception of alternatives and the preferred alternative, however that leaves out the public from understanding how they came to an informed decision, and thus does not seem to support the adopted public involvement goal of transparency. The project does not give me the impression that input was not used to influence the proposed federal action, however there is a lack of clarity that it did so. As someone just jumping into this project and assessing the proposed alternatives, it is difficult for me to understand how the work in conducting engagement informed conception of the alternatives and could use greater clarity to account for this.	The project website provides a draft and final Feasibility Study that details coordination and input around the development of alternatives for the project. Those documents can be found here: https://www.multco.us/earthquake-ready-burnside-bridge/feasibility-study-archive.	Jennifer Hughes

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110020	Public Involvement	Jacob Storm	How can the SDEIS be Improved? To mitigate this issue, I recommend that lead agencies work with engagement staff to develop a report, perhaps building off of Attachment K: Summary of Public Involvement and Agency Coordination and/or the four public engagement phase summary reports, that clearly delineates how key findings from engagement were utilized, how they modified alternatives, and what was eventually proposed in the SDEIS. These key findings are very clear and concise, however they leave the public wondering how these key findings were considered. The report could be organized by major themes that were noticed in engagement. For example, some of the more broad key findings, like "support for the project purpose to create a crossing that will withstand a large earthquake in downtown Portland was heard through all outreach methods" could be part of a broader theme of "project public opinion" that could contain a narrative of how everything pertaining to public opinion about the project is utilized, valued, or factored into the project by the decision-making body. More specific key findings like "strong support for removing the High Fixed Bridge from further consideration came through input received" could fit into a section dedicated to specific alternatives that this finding pertains to. Perhaps there could be a reply to this specific key finding that lets the public know if, or if not, the High Fixed Bridge was removed from consideration. These are only a few possible ideas, but by doing this, agencies involved in implementing this will promote a stronger sense of decision-making power in the public, build trust, and encourage greater participation in future participatory processes.	The project website provides a draft and final Feasibility Study that details coordination and input around the development of alternatives for the project. Those documents can be found here: https://www.multco.us/earthquake-ready-burnside-bridge/feasibility-study-archive. The FEIS Chapter 5 includes an update of public involvement and agency coordination activities.	Jennifer Hughes
110021	Public Involvement	Jacob Storm	How the SDEIS Falls Short Upon reading through the four individual phase outreach summaries, outreach with houseless communities and individuals may be a major gap that exists particularly due to issues of access to the modes of engagement available to the general public. While organizations focusing on houselessness were included in task groups and project committees, many of the engagement opportunities made available to the general public like the online open house, survey, and mailing of flyers either require access to the internet or a permanent address, two things which are barriers to accessing this information, and ultimately the participation of houseless individuals. Modes of outreach like community tabling events at farmers markets could be considered modes which are accessible to houseless individuals, however these settings are not particularly welcoming for them. Lastly, DEI outreach focus groups specifically consider eight cultural and racial identities across all phases, however housing status was not a consideration. This highlights a major gap in equity for houseless communities and a voice that was not given equal access to information or to participate. Given the high quantity of houseless individuals and their reliance on social services organizations concentrated in the project area, this gap in engagement is concerning as it does not convince me that the needs of this vulnerable population will be adequately met during construction due to impacts imposed on surrounding areas.	Comment acknowledged, thank you. The Earthquake Ready Burnside Bridge Project focused its outreach related to the houseless population by coordinating with the organizations that serve this population. Engaging these service organizations was considered the most effective way to solicit feedback for how the project might affect these populations.	Jennifer Hughes
110022	Public Involvement	Jacob Storm	How can the SDEIS be Improved? It is recommended that targeted outreach to houseless populations is pursued to ensure that the project will adequately respond to the issues they anticipate and their input on alternatives that would best respond to their needs. Modes of engagement must prioritize making project-related information accessible to houseless populations. As previously mentioned, internet access is a barrier and is therefore not accessible to these populations. Advertising for outreach through paper flyers placed in locations often utilized by houseless populations would be more accessible. Accessibility of this information must also consider the struggles that they are facing and the likelihood that these could lead to opting out of participating. For this reason, incentives like a small gift card would dramatically improve willingness to participate and how accessible information pertaining to this project is to them. Lastly, leaning on the connections that important social service organizations like Street Roots, JOIN, or Transition Projects have with these communities and seeking their assistance in acting as engagement community liaisons would likely ease potential issues of unwillingness to participate due to government distrust.	Comment acknowledged. The Earthquake Ready Burnside Bridge Project focused its outreach related to the houseless population by coordinating with the organizations that serve this population. Engaging these service organizations was considered the most effective way to solicit feedback for how the project might affect these populations.	Jennifer Hughes

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109815-1	Public Involvement	Jacob Storm	Recommendation 2: Access to information Importance Another key facet to meaningful engagement is ensuring that people have equal access to information in order to promote a deliberative process of public participation. Equal access helps stakeholders to envision the implications and possible results of their input and the ultimate decision that decision-makers make. Having accessible and relevant information is critical to a meaningful engagement process.5 How the SDEIS Falls Short Upon reading through the four individual phase outreach summaries, outreach with houseless communities and individuals may be a major gap that exists particularly due to issues of access to the modes of engagement available to the general public. While organizations focusing on houselessness were included in task groups and project committees, many of the engagement opportunities made available to the general public like the online open house, survey, and mailing of flyers either require access to the internet or a permanent address, two things which are barriers to accessing this information, and ultimately the participation of houseless individuals. Modes of outreach like community tabling events at farmers markets could be considered modes which are accessible to houseless individuals, however these settings are not particularly welcoming for them. Lastly, DEI outreach focus groups specifically consider eight cultural and racial identities across all phases, however housing status was not a consideration. This highlights a major gap in equity for houseless communities and a voice that was not given equal access to information or to participate. Given the high quantity of houseless individuals and their reliance on social services organizations concentrated in the project area, this gap in engagement is concerning as it does not convince me that the needs of this vulnerable population will be adequately met during construction due to impacts imposed on surrounding areas...(continued in 109815-2)	Thank you for your comments. As discussed in Attachment K: Summary of Public Involvement and Agency Coordination, twelve participants (including Portland Rescue Mission, Bridgetown Night Strike, and Central City Concern) provided detailed input to the project regarding social service issues and needs. The County commits to continuing this coordination with social service providers in advance of, as well as during, the Final Design phase.	Sabrina Robinson
109815-2	Public Involvement	Jacob Storm	...(continued from 109815-1) How can the SDEIS be Improved? It is recommended that targeted outreach to houseless populations is pursued to ensure that the project will adequately respond to the issues they anticipate and their input on alternatives that would best respond to their needs. Modes of engagement must prioritize making project-related information accessible to houseless populations. As previously mentioned, internet access is a barrier and is therefore not accessible to these populations. Advertising for outreach through paper flyers placed in locations often utilized by houseless populations would be more accessible. Accessibility of this information must also consider the struggles that they are facing and the likelihood that these could lead to opting out of participating. For this reason, incentives like a small gift card would dramatically improve willingness to participate and how accessible information pertaining to this project is to them. Lastly, leaning on the connections that important social service organizations like Street Roots, JOIN, or Transition Projects have with these communities and seeking their assistance in acting as engagement community liaisons would likely ease potential issues of unwillingness to participate due to government distrust. — I appreciate your consideration of my recommendations to improve the public involvement process for this project. I hope that these recommendations will be adopted into this process to fill these gaps that I have highlighted. As a Portland resident, I am very excited that this project is being pursued so thoughtfully and innovatively. I am looking forward to a safer and more resilient Burnside Bridge that better serves and responds to a variety of transportation options and its diversity of users. Please do not hesitate to reach out to me with any questions or comments you may have regarding submittal of this comment letter. Sincerely, Jacob Storm	Thank you for your comments. As discussed in Attachment K: Summary of Public Involvement and Agency Coordination, twelve participants (including Portland Rescue Mission, Bridgetown Night Strike, and Central City Concern) provided detailed input to the project regarding social service issues and needs. The County commits to continuing this coordination with social service providers in advance of, as well as during, the Final Design phase.	Sabrina Robinson
109717	Noise and Vibration	Jake Belan	Noise & Vibration: this section adequately describes all potential impacts of noise and vibrations throughout all phases of the proposed project. This section is compliant with applicable laws, regulations, and standards. Appropriate mitigation measures are presented and explained for the potential impacts of the proposed project.	Comment acknowledged.	Scott Noel
109718	Air Quality	Jake Belan	Air Quality: impact assessments and analyses using reasonable scientific methods adequately evaluated each environmental impact. The significance of each impact was explained and well-documented. The mitigation measures were compliant with applicable regulations, laws, and standards. The measures are not defined in sufficient details, but are briefly summarized.	The FEIS/ROD for this project contains the final mitigation measures developed in coordination with city, state and federal agencies and as required by related permits and approvals. Please see the Air Quality Technical and Supplemental Memoranda developed for the DEIS and SDEIS for more information.	Scott Noel

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109719	Hazardous Materials	Jake Belan	Hazardous Materials: this section adequately evaluates all potential direct, indirect, and cumulative effects from the proposed project. Each impact is sufficiently evaluated and prepared well. This section has the most extensive descriptions and documentation for each specific impact. The mitigation measures are adequately introduced for property acquisition, impacts of hazardous materials encountered during construction, impacts on hazardous resources from construction activities, and cumulative impacts. The appropriate plans, programs, standards, and assessments for the mitigation measures were sufficiently followed and conducted.	Comment acknowledged.	Kelly Carini
109720	NEPA Process	Jake Belan	Discussion of the SDEIS for Decision Making This Supplemental Draft Environmental Impact Statement for the Earthquake Ready Burnside Bridge Project can be used effectively as a tool for decision making, because it was prepared adequately according to the National Environmental Policy Act (NEPA) and all applicable laws, regulations, and standards. This SDEIS could benefit from organizing its topics and context in a clear and coherent arrangement, with minimal references to other related reports or documents. Replacing the referenced materials with the actual information or a summary would help the document be easier to understand. The description of the project and the various affected environments are sufficiently explained. After the public comment period for the SDEIS document, a final EIS will be prepared to respond to the comments. A Record of Decision (ROD) will be prepared by the Federal Highway Administration (FHWA) regarding a formal decision on which alternative to build, explain the basis for the decision, identify the environmentally preferable alternative, and determine the adopted means to avoid, minimize, and compensate for the environmental impacts (Executive Summary S-1). This SDEIS will be a useful tool for those responsible in the implementation of the project after approval by the lead agency. This comprehensive document presents the proposal for the construction of the Burnside Bridge in Portland, OR to make it earthquake-ready in the event of a CSZ earthquake.	Comment acknowledged.	Shane Phelps
109721	Geology	Jake Belan	My final suggestions that should be expanded on in the Final EIS are the potential impacts from a moderate to high landslide potential in the location of the proposed foundational supports of the bridge	The impacts from moderate to high landslide potential on bridge infrastructure are detailed in original and revised versions of the Geotechnical Report and the Seismic Design Criteria Report.	Rick Malin
109722	Vegetation, Wildlife and Aquatic Resources	Jake Belan	My final suggestions that should be expanded on in the Final EIS are the potential impacts from migratory bird species laying eggs on the bridge.	Potential impacts to migratory bird species are analyzed in the Vegetation, Wildlife, and Aquatic Species Technical Report.	Rachel Barksdale
109735	Acquisitions and Relocations	Jake Belan	? Acquisitions & Relocations: this section lists all of the impacted properties that were identified. Many of the impacted properties have been granted temporary construction easement, temporary construction easement for access closures only, permanent easement, full acquisition, partial acquisition, or none. Long-term and short-term impacts were thoroughly described. Mitigation measures effectively address impacts from acquisition and displacements, design and construction, property and parking access, access to social services.	Addressed in SDEIS. Comment acknowledged.	Patricia Thayer
109736	Land Use	Jake Belan	? Land Use: the discussion of direct impacts and compliance with zoning codes, development standards, and land use reviews are adequately mentioned. The indirect, temporary, and post CSZ earthquake impacts are concisely explained. The EQRB Land Use Technical Report was adequately prepared. The mitigation measures are comprehensively presented. This section could benefit from mentioning that many of the potential relocation sites for displaced businesses are within either the 100- or 500-year flood zone boundaries according to DOGAMI's Oregon HazVu.	Thank you for your comment. FEMA's 100-year floodplain was used for evaluating potential flooding events in the Hydraulic Impacts Analysis Technical Report, Climate Change Technical Report, and Wetlands and Waters Technical Report. Please refer to those reports for additional information. Redevelopment opportunities are consistent with the Metro 2040 Growth Concept and current zoning regulations.	Sabrina Robinson
109737	Economics	Jake Belan	Economics: this section effectively explains the impacts for each alternative and appropriately uses tables to represent quantified data. The EQRB Economic Impacts Technical Report was adequately prepared and the mitigation measures were briefly described.	Comment acknowledged.	Ewa Tomaszewska
109738	Public Services	Jake Belan	? Public Services: the potential impacts on public services were adequately discussed. The mitigation measures clearly describe the coordination with public service agencies and with other affected parties.	Comment acknowledged.	Sabrina Robinson
109739	Utilities	Jake Belan	? Utilities: this section adequately explains the potential impacts on existing utilities after a CSZ earthquake and discusses the relocation of the utilities. The use of data tables makes the information more comprehendible. The potential mitigation measures were sufficiently described.	Addressed in SDEIS Section 3 Utilities. Comment acknowledged.	Cory Burlingame

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109740	Social and Neighborhood Resources	Jake Belan	? Social & Neighborhood Resources: the impacted properties from the proposed project are represented well in a data table. This section could benefit from evaluating the impacts on induced population growth. The mitigation measures are extensively and clearly described.	Thank you for your comment. Section 3.4.2 of the DEIS indicated the build alternatives were not expected to change travel patterns or volumes and so would not induce land use change or growth. Section 3.8.2 of the DEIS evaluated indirect effects to the neighborhoods over time, such as those related to the indirect effects of utility and roadway upgrades in the Project Area that could incentivize further development (and neighborhood impacts) in the Project vicinity in the Social/Neighborhoods Technical Report. Recent City of Portland (Central City 2035) and Metro (RTP) plans recognize the API as part of the Central City business and cultural hub, with plans for intensive development for housing and employment.	Sabrina Robinson
109741	Comment noted, Environmental Justice and Equity	Jake Belan	? Environmental Justice: the potential indirect and cumulative impacts that would result in disproportionately high and adverse effects on low-income and minority populations were adequately identified. The mitigation measures section is comprehensive and covers many topics. The economic measures section has minimal information regarding how the distribution of economic benefits to low-income and minority workers, disadvantaged, small, woman, or minority-owned business enterprises will occur.	The Economics chapter of the SDEIS summarizes mitigation measures for the Preferred Long-Span Alternative that would include actions to reduce the financial burden of various impacts to the affected parties, including environmental justice (EJ) populations. As noted in the DEIS, Multnomah County, in coordination with the City of Portland and other agencies, would accomplish this in the following ways: - Alignment with Multnomah County Contracting and Procurement for Culturally Specific and Responsive Services (2017) Guidance - Alignment with the Regional Workforce Equity Agreement (RWEA) and City of Portland Equity Contracting Program - TriMet subsidized/free fare assistance for qualifying EJ populations during construction detours - Multnomah County will also explore ways to offset benefits during the future design and construction phases via non-profit workforce development programs, coordination with union representatives, minority contractors, and pre-apprenticeship training programs to equitably provide project benefits to low-income and minority workers, small, emerging, DBE, and WBE business enterprises.	Eduardo Montejo
109742	Parks and Recreation	Jake Belan	Parks & Recreation: the potential impacts on parks and recreation resources were adequately explained for the proposed project. This section could benefit from including the potential demand increase for neighborhood or regional parks during the construction of the bridge. The mitigation measures have been adequately presented for each alternative option.	The Parks and Recreation impacts analysis explains impacts to resources within the area of potential impact. Because the project will occur within a large metropolitan area with a large supply of parks and bike and pedestrian facilities, any recreationalist choosing to utilize another park or facility in the region has many choices, thus increased demand at any one facility outside of the area of potential impact is unknown.	Jennifer Hughes
109743	Archaeological and Historic Resources	Jake Belan	? Historic & Archaeological Resources: this section lists all historic and archaeological resources that would be affected by the proposed project. The impacts on the National Register of Historic Places (NRHP) listed and eligible resources are described clearly. Communication and consultation with Native American tribes and bands that are indigenous to Portland, OR should be conducted to determine if there are any historically or culturally significant sites within the proposed project's API boundaries. The mitigation measures of the identified historic places have been adequately discussed.	Comment acknowledged. Tribes that identify the project area as an area of interest are members of the Section 106 Consulting Parties group for this project. In addition, FEIS Chapter 5 Summary of PI, Agency Coordination, and Comments provides a description of coordination with Tribes.	David Ellis
109744	Visual and Aesthetic Resources	Jake Belan	Visual & Aesthetic Resources: all proposed alternative options are visually modeled from various angles using figures to represent their impacts. The impacts on visual quality were also examined and displayed with a data table. The mitigation measures were thoroughly explained.	Comment acknowledged.	Josh Carlson
109745	Geology	Jake Belan	Geology: this section discusses many of the geologic impacts that would result from the proposed project. Liquefaction susceptibility was adequately examined and explained, but there is no mention of landslide susceptibility being moderate to high in the API boundaries, according to DOGAMI's Oregon HazVu. Mitigation of excavation and construction practices are adequately explained to prevent risk to human health and ecological health.	The impacts from moderate to high landslide potential on bridge infrastructure are detailed in original and revised versions of the Geotechnical Report and the Seismic Design Criteria Report.	Rick Malin
109746	Wetlands and Waters	Jake Belan	? Water Quality: the potential impacts to the water quality of the Willamette River from stormwater discharge are adequately mentioned and evaluated. There is no mention of the indirect impacts from anthropogenic littering and minimal information about pollution from automobiles. This section would benefit from explaining if the proposed stormwater management system would remain functional after a 9.0+ magnitude CSZ earthquake. There is minimal discussion of how the cumulative effects of stormwater will affect the water treatment facilities. The mitigation measures adequately describe the plans to treat stormwater with manufactured facilities and follow all required laws, regulations, and standards.	Addressed in the DEIS. The water quality analysis for the project followed current federal, state and local standards. Section 3.14.2 discusses how the proposed stormwater system would function post CSZ earthquake. All stormwater generated by the project will be treated prior to discharging to the combined sewer that is treated at the Columbia Blvd water treatment plant.	Cory Gieseke
109747	Floodplain and River Hydraulics	Jake Belan	Floodplain & River Hydraulics: this section effectively describes the potential impacts of floodway encroachment and change in scour length for all alternatives including the temporary work bridge. Mitigation measures to minimize hydraulic impacts by reducing the number of piers or designing the bridge pier structures to minimize energy losses were adequately examined.	Comment acknowledged.	Julie Garnet

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109748	Vegetation, Wildlife and Aquatic Resources	Jake Belan	? Vegetation, Wildlife, & Aquatic Resources: the potential impacts on wildlife, vegetation, and aquatic life are thoroughly presented and discussed. All potential impacts from each phase of the proposed project are adequately described.	Comment acknowledged.	Rachel Barksdale
109571	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.3: 45-47: Table 12: Suggest removing the word 'Downtown' in text and table since not all of these bridges are downtown.	Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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 SDEIS analysis.	Adrian Witte
109572	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.2: 32: : Unsignalized intersections operating at LOS E meet Portland LOS standards.	Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section in the SDEIS errata chapter of the FEIS. The statement has been edited to better reflect LOS standards for the roadway.	Lewis Kelley
109573	Comment noted	Multnomah County Bike and Pedestrian Citizen Advisory Committee (BPCAC), Andrew Holtz	Hi, The attached comment on the Supplemental Draft EIS for the Earthquake Ready Burnside Bridge was approved by the Multnomah County Bicycle & Pedestrian Citizen Advisory Committee (MCBPCAC) at its regular monthly meeting on June 8, 2022. Regards, Andrew Holtz Chair, MCBPCAC ** Attached letter:** Multnomah County Board of Commissioners 501 SE Hawthorne Blvd, Ste 600 Portland, OR 97214 The Multnomah County Bicycle and Pedestrian Citizen Advisory Committee (MCBPCAC) appreciates the progress shown in the Supplemental Draft Environmental Impact Statement (SDEIS) toward designing an Earthquake Ready Burnside Bridge that will support the region's recovery from a magnitude 8+ Cascadia Subduction Zone earthquake.	Comment acknowledged.	Steve Drahota
109574	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.4: 58: : Unsignalized intersections operating at LOS E meet Portland LOS standards.	Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made in the Transportation section in the SDEIS errata chapter of the FEIS. The statement on LOS performance has been edited to better reflect LOS standards for the roadway.	Lewis Kelley
109575	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.4: 58: : Please review the delay increase at NW Couch & 2nd of +146-s as it may be the result of blown simulation runs.	Blown simulation runs are always removed before reporting analysis results, so the delay increases accurately reflected the analysis done at the time. Please note that the traffic operations analysis has been updated in Chapter 4 Supplemental Analysis of the FEIS based on PBOT comments sent on 2/8/22.	Emily Welter
109576	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.4: 58: : Typo - an extra intersection is described in the last paragraph before "(Intersection #7)"	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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 SDEIS analysis.	Adrian Witte
109577	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: Executive Summary: ES-3: : The executive summary notes that all options will have higher crash rates. This should say that they "are predicted to" have higher crash rates. This statement does not acknowledge the role of the barrier reducing the risk of fatal/injury crashes that have occurred.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section in the SDEIS errata chapter of the FEIS. All language changed to "it is predicted" "it is estimated" "it is forecast" as appropriate.	Beth Wemple

Comment ID	Topic	Comment By	Comment	Response	Response By
109578	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.2: 26: : Under Traffic/Freight Operations, in the 1st paragraph, add the word "funded" after the word "following", or similar change to indicate these are upcoming - not completed - projects.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section in the SDEIS errata chapter of the FEIS. Edited statement to make clear that the projects are funded and planned rather than complete.	Lewis Kelley
109579	Transportation - Long term bike, ped & ADA	Multnomah County Bike and Pedestrian Citizen Advisory Committee (BPCAC), Andrew Holtz	However, the committee has several concerns about the substantial reductions in bicycle and pedestrian infrastructure in the Refined Long-span Alternative. Although the SDEIS recognizes that narrowing the paths on the bridge will increase conflicts between people bicycling and walking,	Comment acknowledged. The reduction in space for active transportation users was a decision made based on cost and budget for the project along with other decisions such as the removal of a traffic lane from the bridge. The County commits to continuing this coordination with the City on this issue in advance of, as well as during, the Final Design phase.	Adrian Witte
109580	Archaeological and Historic Resources	National Parks Service, Allison Hall (nee O'Brien)	The NPS is actively participating in the National Historic Preservation Act (NHPA) Section 106 consultation for the Earthquake Ready Burnside Bridge 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. The Skidmore/Old Town NHL District (NHL District) is a twenty-block concentration of historic commercial buildings constructed between 1857 and 1929. The NHL District is nationally significant under NHL Criteria 1 for its historical association with the early development and economic growth of Portland, Oregon, and the concentration of buildings that embody Portland's commercial, social, and settlement history, including the later history of disadvantaged and house-challenged people of the urban core. The NHL district is also nationally significant under Criteria 4 as one of the finest collections of mid- and late-nineteenth-century cast-iron commercial buildings in the Far West. We concur with the Federal Highway Administration's assessment that the Refined Long-span Alternative with girder bridge for the west approach (preferred alternative) will be less intrusive on the Skidmore/Old Town National Historic Landmark District (NHL District) than the existing bridge, which does not contribute to the NHL district. The preferred alternative would reduce the pairs of columns under the bridge in Waterfront Park from five with the existing bridge to just two and reducing the physical and visual intrusion for the bridge structure. The structure in this location for the preferred alternative also would have less of a visual impact than the above-deck bridge types (tied-arch, cable-stayed and through-truss) alternatives. We also concur that the preferred alternative will maintain the open character and existing views of the existing approach while the taller, modern structures of the other alternatives would further obstruct historic views from and to the district. These taller alternative approaches would likely cause an adverse effect on the NHL District.	Comment acknowledged. The County commits to continuing this coordination with the NPS in advance of, as well as during, the Final Design phase.	David Ellis
109581	Active Transportation Access Options	National Parks Service, Allison Hall (nee O'Brien)	The proposed elevator and new stairs from the pedestrian way of the bridge down to West 1st Avenue will introduce a new structure within the NHL District. It will replace the nearby existing stairway. This change will be visible within at least 4 of the 20 blocks located in the NHL District. The NPS requests an opportunity to review the elevator and stair design to ensure they are compatible with the NHL District.	Comment acknowledged. Constructing new stairs is only one option for access from the bridge to 1st Avenue. The Project will comply with all regulatory review requirements are needed to construct whichever option is selected for this access during the Final Design phase.	Steve Drahota
109582	Air Quality	Multnomah County Bike and Pedestrian Citizen Advisory Committee (BPCAC), Andrew Holtz	it fails to acknowledge other effects on health and the environment that will result from the cost cutting measures. Because the reduced bicycle and pedestrian infrastructure will result in fewer people bicycling or walking instead of driving compared to the original proposed bridge design, the committee disagrees with the claim that the "impacts from the Refined Long-span Alternative would be the same as described in the Draft EIS" with regard to mobile source air toxics. (3-120 | SECTION 3.19)	Traffic projections for the proposed project are inclusive of the effects relating to changes in bike/ped under the Refined Long-span Alternative and these changes are marginal relative to what was analyzed previously. The traffic projections are the basis for the air quality analysis which demonstrates insignificant differences in air pollutants.	Scott Noel
109583	Transportation - Long term bike, ped & ADA	Multnomah County Bike and Pedestrian Citizen Advisory Committee (BPCAC), Andrew Holtz	The SDEIS is also defective because it does not address the associated impacts of crashes, sedentary behaviors and other health and environmental impacts that are foreseeable from the reduced support for active transportation.	The safety (crash) impacts are factored into the transportation assessment. The County conducted a health assessment that considers the impacts of the project including closures of the bridge and Eastbank Esplanade.	Adrian Witte
109584	Transportation - Long term bike, ped & ADA	Multnomah County Bike and Pedestrian Citizen Advisory Committee (BPCAC), Andrew Holtz	The revised plan dramatically reduces bicycle and pedestrian path widths from 20' on each side of the bridge to 14' to 17'. It is important to note that staff told the Board of Commissioners at its March 17, 2022 meeting that achieving the upper end of the 14' to 17' range for bicycle and pedestrian space would require taking more width from motor vehicle lanes. The county should restore minimum path widths that at least approach the initial design width of 20' on each side. Without that restoration, the new plan will not achieve the human health and environmental improvements that were included in the original Draft Environmental Impact Statement.	Comment acknowledged. The allocation of 14'-17' of space for active transportation users was a decision made based on cost and budget for the project along with other decisions such as the removal of a traffic lane from the bridge. The active transportation space allocation and opportunities to reconfigure vehicle space to maximize active transportation space was discussed with PBOT and will be decided in final design. The County commits to continuing this coordination with the City on this topic in advance of, as well as during, the Final Design phase.	Adrian Witte

Comment ID	Topic	Comment By	Comment	Response	Response By
109585	Sustainability and Climate Change	Multnomah County Bike and Pedestrian Citizen Advisory Committee (BPCAC), Andrew Holtz	The MCBPCAC endorses the substance of a joint comment on the SDEIS from the City of Portland Bicycle Advisory Committee and Pedestrian Advisory Committee, which calls out the need to build a bridge that plays a part in reducing greenhouse gas emissions. The joint letter states, “In March 2021 our committees submitted a letter covering many of the same concerns and with one exception they have been largely unaddressed or made worse through the value engineering that has occurred through this round of cost cutting.”	Comment acknowledged.	Scott Noel
109586	Transportation - Short term bike, ped & ADA	Multnomah County Bike and Pedestrian Citizen Advisory Committee (BPCAC), Andrew Holtz	The city advisory committees found deficiencies in space allocation, connections to the larger transportation network, and planning for travel disruptions during construction. We urge Multnomah County to work with the City of Portland to address the concerns highlighted by the city advisory committees	Comment acknowledged. The County and its project team are working with PBOT to address space allocation, which will be reflected in final design. The County commits to continuing this coordination with the City on this topic in advance of, as well as during, the Final Design phase.	Adrian Witte
109587	Sustainability and Climate Change	Multnomah County Bike and Pedestrian Citizen Advisory Committee (BPCAC), Andrew Holtz	A major earthquake could happen at any time. We must prepare for that potential disaster while also taking effective action to mitigate the disastrous effects of vehicle emissions on our climate and the multiple harms to the health of people in our community caused by overreliance on motor vehicles. These are not potential disasters; they are happening now. The SDEIS fails to adequately address the health and environmental effects of the changes to the project since the original Draft EIS. We cannot afford to waste the rare opportunity to build a bridge in the heart of the city that will entice and support people who want to walk or bicycle instead of drive. The Burnside Bridge replacement as presented in the SDEIS is inadequate to the needs of our region now and for the coming century or longer that the bridge will be in service.	The DEIS and SDEIS both include climate change analysis in Chapter 3 of each document. Additionally, please see the original and supplemental Climate Change analysis technical memoranda written to support the DEIS and SDEIS, respectively. Moreover, the project is utilizing the Greenroads Rating system, which provides guidance to public entities that seek a resilient and sustainable future and are interested in measuring and managing sustainability on transportation projects like the EQRB Project. Please see the Greenroads Technical Report that accompanies the DEIS.	Shane Phelps
109588	Comment noted	Multnomah County Bike and Pedestrian Citizen Advisory Committee (BPCAC), Andrew Holtz	Thank you for your consideration, Motion to submit letter approved June 8, 2022 Andrew Holtz Chair, Multnomah County Bicycle and Pedestrian Citizen Advisory Committee	N/A	Steve Drahota
109589	Sustainability and Climate Change	Multnomah County Bike and Pedestrian Citizen Advisory Committee (BPCAC), Andrew Holtz	Multnomah County’s adopted Climate Action Plan (2015) directs the county to “Identify opportunities for expanding pedestrian, bicycle and other multimodal transportation options on Willamette River bridges” (p. 82, Action 4CC, emphasis added). The revised project plan does not align with that action.	The proposed bridge configuration does enhance multimodal transportation conditions and as a result will likely encourage these modes. The existing bridge includes a 7.3' curb-tight sidewalk on either side next to a 5.5' bike lane that is at the same level and adjacent to 5 moving traffic lanes. The bike lane is buffered from traffic with a 2' painted stripe and with flexible delineators in some places. The proposed bridge configuration includes a multi-use pathway for pedestrians, bicyclists, and other active transportation users that is at sidewalk grade and protected from traffic by a crash-worthy barrier. This is a more comfortable facility type that will encourage a wider range of bicyclists to use the bridge. In addition, there are enhancements proposed to the connections on either side of the bridge that includes signal separated bicycle phases and enhancements of crossings and crosswalks. The proposed bridge configuration will maintain the existing eastbound transit lane and leaves open the option of creating a westbound transit lane in the future.	Adrian Witte
109590	Social and Neighborhood Resources	National Parks Service, Allison Hall (nee O'Brien)	The preferred alternative will eliminate the existing attachment of buildings in the White Stag Block (Skidmore Block, # 72) to the bridge. This will create an opening between the approach span and the adjacent buildings, which will enhance the ability of the White Stag Block to survive a major earthquake and provide greater public visibility of the ground-level façade of the White Stag Block. The Stag Block contributes to the NHL District. We concur that the project should follow the Secretary of the Interior’s Standards for the Treatment of Historic Properties to avoid and minimize material loss, visual changes and impacts during and after the bridge approach is separated from the block. The Bates Building (# 56), Burnside Hotel (Shoreline Hotel) (# 43), and the Salvation Army Buildings (# 44) also are contributing buildings of the NHL District. We concur that the project should follow the Secretary of the Interior’s Standards for the Treatment of Historic Properties to ensure that replacement of the existing sidewalk and any repairs to the façades are done in such a manner as to not adversely affect them. We concur that the project will have no adverse effect on the Reed Building (# 74): (Skidmore Fountain Building; Packer-Scott Building), a contributing building to the NHL District.	Comment acknowledged.	Sabrina Robinson

Comment ID	Topic	Comment By	Comment	Response	Response By
109591	Noise and Vibration	National Parks Service, Allison Hall (nee O'Brien)	As we noted in our comments to the EIS, we concur 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. 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.	Comment acknowledged.	Scott Noel
109592	Archaeological and Historic Resources	National Parks Service, Allison Hall (nee O'Brien)	As noted in the SDEIS, the Portland harbor wall (seawall), Ankeny Pump Station, and the White Stag sign do not contribute to the NHL District, although they are National Register eligible.	Comment acknowledged.	David Ellis
109593	Section 4(f)	National Parks Service, Allison Hall (nee O'Brien)	4(f) DETERMINATION As required under Section 4(f) of the Department of Transportation Act, the Department, through the NPS, offers the following for the 4(f) documentation and analysis in Chapter 3 and Attachment M of the DEIS. 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. Any further visual design should be assessed for the least overall harm to the NHL district. We appreciate the project's analyses on visual impacts to the NHL District since the DEIS. Based on these analyses, we concur with the 4(f) determination that there is no constructive use of the NHL District. Please contact Dr. Elaine Jackson-Retondo, Preservation Partnerships and History Programs Manager (elaine_jackson-retondo@nps.gov, (510) 410-2315) for questions or further information. If there are any other questions or concerns, then please contact me at (503) 720-1212 or via email (allison_obrien@ios.doi.gov).	Section 2.4.5 Alternative with the Least Overall Harm evaluates which alternative causes the least harm to all Section 4(f) resources. Because the preferred alternative does not have a Section 4(f) use of the Skidmore/Old Town NHL, the relative importance of that resource does not need to be established in the Section 4(f) analysis.	Jennifer Hughes
109600	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.4: 58-59: : Simulated queuing of the zipper merge appears to indicate that the simulated merge capacity is less than the 1,500 vph described, since the demand is less than 1,400 vph. Simulation findings would be affected.	The ideal flow rate for a single line across Burnside Bridge was estimated based on the characteristics of the roadway such as speed limit and lane and shoulder widths. This capacity was coded into SimTraffic for both directions of travel and impacted the number of vehicles that could travel through the proposed zipper merges for the relevant Lane Options, so it is reasonable that the simulated merge throughput is less than the estimated ideal flow rate. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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 SDEIS analysis. Please note that the traffic operations analysis has been updated in the Supplemental Analysis chapter of the FEIS in response to PBOT comments sent on 2/28/22.	Emily Welter
109601	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.4: : Table 17: Red text is used where queues exceed storage, but some links seem too short to provide meaningful info. W Burnside at Broadway appears to queue out of the model in every scenario. Longer links would be ideal, but if not possible then perhaps a note (*) could document locations that queue out of the model.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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 SDEIS analysis. The links on the edges of the Synchro model were drawn to the existing lengths.	Emily Welter

Comment ID	Topic	Comment By	Comment	Response	Response By
109602	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Revised AT Access Options Memo: Page 22-26, Sect 4.2: : This section should consider a mid-block red-light traffic signalized crossing for all options, not just Option 3. For Option 1, the crossing would be necessary for when an elevator on either side is inoperable and someone needing an elevator would need to get to the working elevator across the street.	A mid-block crossing is not included as an element within the FEIS / ROD Preferred Alternative. 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 Drahota
109603	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	: General: : With reference to the comment made about reattaching the existing staircase to the new bridge for the connection to the Eastbank Esplanade, the City is exploring the legality of reattaching a facility that is not ADA compliant.	Comment acknowledged.	Steve Drahota
109604	Social and Neighborhood Resources	Adam Simmons	Aside from a bridge that functions to connect the two sides of the city that can be fully functional after the major earthquake event, its important for it to consider all of the various users from car, to bus, to bike, to the skateboarders below at the Burnside Skatepark. The skatepark is a national treasure and one of the first in the country. As a modern cultural landmark it is world renown and an integral part of identity of the city.	Thank you for your comment. The Refined Preferred Alternative would require temporary closure of the skatepark during construction but would not create any permanent impacts.	Sabrina Robinson
109605	Comment noted	Jake Belan	Attached letter: Emily Cline Federal Highway Administration, Oregon Division Earthquake Ready Burnside Bridge Project 530 Center Street NE Salem, OR 97301 To Whom It May Concern: This letter is written in response to the Supplemental Draft Environmental Impact Statement (SDEIS) for the Earthquake Ready Burnside Bridge (EQRB) Project. I am a student and a concerned citizen interested in the processes of environmental management systems. This SDEIS is important to me because the proposed project will have an effect on me and my surrounding community. This letter will address the preparation of the SDEIS and sections with insufficient information	N/A	Steve Drahota
109606	Comment noted	David Fowell	Let us go back to the drawing board. We want to create a major earthquake readiness for the city as our main goal. Let us burry the east bank freeway and train tracks then all the central city bridges can be replaced with less cost by having shore to shore bridges like downtown Chicago. You decrease the height of the bridges so people can jump from them and not kill themselves--suicide prevention. You connect shore to shore so the bridges become very small in distance reducing the bridge costs substantially as the material you need goes way down not only for length, but height. When you consider all the benefits from this we will save substantially over all for replacing all bridges eventually and increase the overall aesthetic of the city. Again, start by burying the east bank freeway and railroad tracks then everything else becomes much simpler and easier to manage.	Comment acknowledged	Adrian Witte
109607	Active Transportation Access Options	Chris Shaffer	Please build a ramp to support active transportation (bicycles) and accessibility (wheelchairs). Don't doom us to more years of carrying things up and down stairs.	Addressed in SDEIS. Comment acknowledged. The Preferred Alternative is being prepared so as to not prohibit the connection of an independent ramp from the Eastbank Esplanade, should the City construct one in the future. The Project will be "protecting-in-place" the existing City stairway to the Eastbank Esplanade.	Steve Drahota
109608	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Lisa Strader	EJ Supplemental Memo: Page 31: ADA Access to Other Facilities How refinement affects EJ populations: Comment that ramps have security and safety concerns isn't something I remember hearing. My notes from several public meetings where this was discussed actually recognize the safety and security benefits of the openness of ramps and all users traveling together with eyes on each other. As noted in a previous comment, level resting areas along the ramp make it more usable by people with disabilities as well as seniors, parents pushing strollers, parents riding bikes with children, and other users who might want a break or to take in the view.	Comment acknowledged.	Steve Drahota
109609	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Lisa Strader	Revised AT Access Options Memo: Page 22 : 4.2 Options for Westside Access to 1st Ave: If the bus stop doesn't move from the north side of the bridge east of 2nd Ave, stairs on the north side of Burnside and the accessible route on the south side of the bridge may not be considered an equivalent accessible route. Someone needing the ramp would need to travel from the stop to 2nd, cross 2nd, then travel back east on the bridge to the ramp location or the opposite if coming from Naito up the ramp and needing to catch the bus on the other side of Burnside..	As part of the Preferred Alternative within the FEIS/ROD, the westbound bus stop on the north side of the bridge is being relocated to the west side of 2nd Ave. Because of this, the issue identified within the comments is resolved.	Steve Drahota
109610	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Lisa Strader	Revised AT Access Options Memo: Page 3: ADA Access: Clarifying that if new stairs are constructed on either end of the bridge, an equivalent accessible route must be provided.	On the west end of the bridge, the Preferred Alternative within the FEIS / ROD includes improved sidewalks on either side of the bridge (i.e., Ankeny and Couch Streets). This would serve as the ADA accessible route if only stairs are constructed. On the end of the bridge, the Preferred Alternative within the FEIS/ROD includes a "Protecting-in-place" the City's steel stairway. The Project will not preclude a future independent ramp to the Eastbank Esplanade from being constructed should the City desire to construct one.	Steve Drahota

Comment ID	Topic	Comment By	Comment	Response	Response By
109611	Archaeological and Historic Resources	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	First, we support most of the changes proposed for the new project's preferred alternative. These changes reduce the impact of the proposed bridge on the Skidmore Old Town historic district and its buildings. However, we are concerned that the discussion of the complete removal of the designated Burnside Bridge in section 3.11 is inadequate. The description of the bridge does not address the unique character of this bridge among Portland's downtown bridges nor does it sufficiently identify how some of the impacts could be addressed or what mitigation is being considered. Lastly, we have a few detailed comments separate from these two primary concerns. Changes we support: There are reduced impacts on the Skidmore district without the above road structures at the west approach. This is a significant improvement both for the district and for views from the bridge to the district and the city skyline.	Addressed in DEIS Errata. Section 3.11.1 includes a more robust description of the importance of the bridge and its character.	David Ellis
109612	Acquisitions and Relocations	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	("Changes we support:") 2. There is less property acquisition proposed, because the bridge is narrower and the project is no longer proposing long ramps from the bridge sidewalks down to SW 1st Ave. 3. Where the project is impacting property, the SDEIS is now proposing permanent easements rather than full acquisitions. We assume that this will allow for future developments built up to the street and sidewalk, desirable in maintaining district character.	2. Ramps on the south side of the bridge, west of the Max rail lines, remain an access option for the Final Design phase. 3. Correct, the County is anticipating the need for Permanent Easements, rather than full fee acquisitions, where permanent ROW is needed. Subject to the exact solution selected as part of the Final Design phase, future development may be allowed. This will determined in the Final Design phase.	Steve Drahota
109613	Archaeological and Historic Resources	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	("Changes we support:") 4. The SDEIS appears to call for the preservation of the bridge sidewalk "Saturday Market" arches and stairs leading down to SW and NW 1st. This is important for the ongoing economic viability of retail and other activities in the district.	Comment acknowledged.	Ewa Tomaszewska
109614	Transportation - Long term bike, ped & ADA	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	("Changes we support:") 5. If elevators are added, small structures above the bridge sidewalk for housing the elevator will be required. The SDEIS assumes this is a minor impact. We agree that the impact can be minor but are interested in how the design will be developed and reviewed.	Comment acknowledged. For the FEIS / ROD, the Preferred Alternative includes a range of potential options for access at the west approach as described in Chapter 6 of the FEIS. Decisions regarding this access will include coordination with the Historic Landmarks Commission and NPS during final design.	Lewis Kelley
109615-1	Archaeological and Historic Resources	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	Our major concern The SDEIS does not adequately address the removal/replacement of the designated historic resource of the Burnside Bridge itself. Section 3.11 discusses the buildings potentially impacted by the preferred alternative bridge. This Section does not adequately describe the unique character of the current bridge. One approach is to replicate the civic design features of the existing bridge in the preferred alternative. The other is to reuse parts of the current bridge in its new replacement. The SDEIS does not clearly speak to either approach. As a result, it does not provide a reasonable mitigation for the complete removal of the historic resource. The current Burnside Bridge is unique in Portland—it is a civic structure integrated into the urban fabric of Portland. In the 1920's, the bridge required a substantial widening of the Burnside Street right-of-way. Nevertheless, the 1920's bridge was built to maintain buildings right up to the right-of-way and sidewalks that provided direct access to adjacent buildings. As a result, the bridge's roadway surface and the sidewalks became the new "ground plane." The walls and spaces below this new ground plane were treated as supporting spaces. The 1920's bridge is designed as a civic object. Unlike earlier Portland bridges it is not solely an engineered object. The operator towers are not simply utilitarian—they are designed as pieces of art and architecture. Integrated into the tower's design are covered areas for pedestrians waiting while the bascule sections are open. The railings of the bridge received similar detailed attention. As built in the 1920's, there were 3 types of handrails- decoratively lighter metal railings for the bascule section of the bridge, heavier concrete bollards for the fixed spans, and green 'temporary" pipe railings where future buildings were expected (some of which lasted for at least 60 years). The result is a bridge that is urban, civic, and ceremonial....(continued in 109615-2)	Addressed in DEIS Errata. Section 3.11.1 includes a more comprehensive treatment of the character of the bridge. The Project Programmatic Agreement states the County will explore options for salvage and reuse of existing bridge elements.	David Ellis

Comment ID	Topic	Comment By	Comment	Response	Response By
109615-2	Archaeological and Historic Resources	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	...(continued from 109615-1) It is obvious that the Bridge has changed over the last 100 years. The streetcar tracks and stops are gone (though the SDEIS suggests that they might return). The bridge has seen a century of events from the Rose Festival to Black Lives Matter demonstrations. These changes and events affect Portlander's understanding and use of the Bridge. In addition, the urban land uses and functions at each end of the bridge have changed. A new bridge should reflect those changes. Nonetheless, the idea of a bridge integrated into the urban fabric still makes sense. On the west side, the Saturday market and Tom McCall Park are different than the former industrial waterfront under the bridge. The east end has also changed, and more recently, as it has moved from part of an "industrial sanctuary" to the "Burnside Bridgehead" urban development. Because the east approach design is not yet resolved, it is difficult to comment. However, it is worth noting that the skate park is a wonderful DIY response to the industrial character below the bridge deck. The SDEIS recognizes this. Above the deck, the situation is less clear. The Templeton Building and the Dumbbell both assume the integration of bridge and urban fabric. The Yard and 5 MLK, two new residential towers, assume a separation of bridge and building. We are concerned that the bridge's replacement establishes a clear recognition of what is being lost with the existing bridge's removal. This calls for a clear design and mitigation approach not identified in section 3.11.3 of the SDEIS. Will the new bridge be designed with the same urban principles used for the 1920's bridge – and/or will the new bridge reuse some of the elements (railings, towers, bascule section, etc.) of the existing bridge?	Addressed in DEIS Errata. Section 3.11.1 includes a more comprehensive treatment of the character of the bridge. The Project Programmatic Agreement states the County will explore options for salvage and reuse of existing bridge elements.	David Ellis
109616	Sustainability and Climate Change	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	Section 3.21.16: Though expanded in detail from the DEIS, comprehensive climate change issues, including those related to the project's carbon footprint, are not fully addressed. Instead, the focus is on possible short-term air/water quality and effects on flora, fauna and flooding. Analysis of the full life-cycle costs, including both that from the new work and the loss from the embedded carbon in the existing resource, should be included. Such comprehensive analysis could have substantial impact on the comparative costs as they relate to preferred alternate options.	Embedded lifecycle emissions were completed using FHWA's Infrastructure Carbon Estimator tool. This tool accounts for typical life-cycle effects from construction of major infrastructure project such as the Burnside Bridge replacement. Please see the Climate Change Technical Report for information.	Scott Noel
109617	Visual and Aesthetic Resources	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	The SDEIS proposes a separation between the new bridge and its sidewalks from existing buildings. This is not compatible with the original urban character of the bridge. It would introduce some light below the bridge deck. It would not, however, make it easy to achieve wall modifications/patching that would meet the Sec of Interior standards.	The separation of the new west bridge approach would be limited to the White Stag Block and would have minimal effects on the urban character of the bridge. Construction of the bridge in 1925-1926 affected the historic character of the buildings abutting the west approach, and the bridge is considered an intrusive element in the Skidmore/Old Town National Historic Landmark District. Separation of the bridge from the White Stag Block would enhance the ability of the White Stag Block to survive a major earthquake. The removal of the bridge structure abutting the building will restore the original historic relationship of the ground level of the White Stag Block to the surrounding streetscape. The separation would not affect the ability to meet Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation.	David Ellis
109618	Construction Methods	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	The SDEIS states that as far as the authors know, existing buildings (with the exception of the U of O block) have not been brought up to current earthquake codes. The SDEIS does not say whether removing the bridge sidewalks attached to those structures will improve or degrade their earthquake readiness. This should be evaluated in the SDEIS and included as a possible mitigation measure.	Comment acknowledged. The existing bridge is not structurally attached to adjacent existing buildings and therefore does not function as part of those buildings earthquake resisting systems. The new bridge will be constructed with a greater clearance to the adjacent existing buildings. Existing deck access will be maintained where required, but not to improve the seismic vulnerability of the building.	Rebecca Bautista
109619	Archaeological and Historic Resources	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	The SDEIS does not identify what will happen with the median and trees in West Burnside, nor whether a pedestrian crossing will be restored on the east side of 2nd Ave. The Skidmore historic district should be knit together as a single place that extends on both sides of Burnside. Changes to the Avenues within and adjacent to the district have reduced the impact of through auto traffic on the district. We believe that maintaining the existing median and adding an additional crossing will help continue that transition.	Figure 3.16.3 on Page 3-99 shows that 6 out of the 7 trees in the median on W Burnside would be removed. A pedestrian crossing on the eastern side of the 2nd Ave intersection does not currently exist and the final allocation of space for the roadway cross-sections and intersection lane configurations will occur during the Final Design phase. The County commits to continuing this coordination with the City during the Final Design phase.	Steve Drahota
109620	Economics	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	The SDEIS does not appear to address the economic impacts to the Skidmore Old Town historic district of the extended construction period when there will be no Burnside Bridge access (and likely no MAX station at least for some time). The district has struggled through the pandemic and an additional period of reduced access and activity is likely to make individual business and district success more difficult. Mitigation measures should be included in the final document.	The SDEIS focused on the difference between impacts from the Draft EIS Preferred Alternative (the Draft EIS Long-span Alternative) and the Refined Long-span Alternative. Possible negative impacts to businesses in the bridge vicinity during bridge construction period were acknowledged in the DEIS (see Section 3.5.3) as well as discussed in greater detail in the Economics Technical Report. The FEIS/ROD includes mitigation measures that address impacts to businesses.	Ewa Tomaszewska
109621	Visual and Aesthetic Resources	Architectural Heritage Center, Steve Dotterrer, Fred Leeson	However, we are concerned that the discussion of the complete removal of the designated Burnside Bridge in section 3.11 is inadequate. The description of the bridge does not address the unique character of this bridge among Portland's downtown bridges nor does it sufficiently identify how some of the impacts could be addressed or what mitigation is being considered.	Comment acknowledged. The bridge is discussed in detail in both the Cultural Resource Technical Report that accompanied the DEIS, as well as the 4(f) Analysis, which is attached to the FEIS. Additionally, impacts to the historic Burnside Bridge, as well mitigation for those impacts can be found in the mitigation section of the FEIS/ROD and the Section 106 Programmatic Agreement.	Josh Carlson

Comment ID	Topic	Comment By	Comment	Response	Response By
109624	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Lisa Strader	Executive Summary: S-37: S.5 Unresolved Issues: With reference to the comment about ADA advocates concerns about long ramps, the advocates further said that level areas along the route would mitigate those concerns. The level areas would benefit other users and could provide views to the river and the city, an aesthetic benefit to all users.	Comment acknowledged.	Steve Drahota
109625	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Lisa Strader	Executive Summary: S-37: S.5 Unresolved Issues: It seems that the accessible connection to the east end of the bridge is also an unresolved issue. S-3 Consequences of the Build Alternative Bike and Ped section that a preferred alternative is not identified..	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.	Adrian Witte
109630	Comment noted	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC)	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 Supplemental Draft Environmental Impact Statement (SDEIS). There is much that we support about the project, including the need for a seismically-resilient crossing of the Willamette River in Downtown. This letter, however, concentrates on where we believe the project can be improved.	Comment acknowledged.	Shane Phelps
109631	Sustainability and Climate Change	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC)	In particular, we believe that an investment of this scale should do more to meet adopted city, county and regional goals than merely "27 percent lower than existing."1 greenhouse gas (GHG) emissions by 2045; it should—and must—play a part in reducing them.	The Preferred Alternative incorporates active transportation and transit as important travels modes across the bridge in support of adopted City, County and regional goals to reduce GHG emissions. Additionally, the Preferred Alternative would have the greatest percentage decrease of on-road GHG emissions in year 2045 from existing conditions when compared to the No-Build Alternative and the Draft EIS Long-span Alternative.	Shane Phelps
109632	Public Involvement	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC)	In March 2021 our committees submitted a letter covering many of the same concerns and with one exception they have been largely unaddressed or made worse through the value engineering that has occurred through this round of cost cutting.	Comment acknowledged.	Sabrina Robinson
109633	Transportation - Long term bike, ped & ADA	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC)	Allocation of space on the bridge The BAC/PAC is disappointed that the revised proposed footprint for people on bicycles, on foot or rolling is nearly identical to the current allocation. There is no space allocated for a buffer between bicycles and pedestrians and the vague guidance allowing for 14'-17' in each direction2 will make it easy to further decrease space for low-impact modes of transportation. Meanwhile the roadway width includes shy distance for motor vehicles from traffic separators, while counting comparable space on the other side of the dividers as being usable for people on bicycles. This is an unwelcome double standard. 2 Earthquake Ready Burnside Bridge - SDEIS - Project Alternatives, page 2-11 1 Earthquake Ready Burnside Bridge - SDEIS - Executive Summary, page S-31 We are still concerned with the space limitations for both the east and west approaches, including that the proposed cross sections provide less room for active transportation than currently exists. This reflects a lack of vision, lack of support, and lack of leadership for the growth and encouragement of walking and bicycling in the city.	Comment acknowledged. The allocation of 14'-17' of space for active transportation users was a decision made based on cost and budget for the project along with other decisions such as the removal of a traffic lane from the bridge. Regarding the usable space next to separators / dividers, the shy distance that a bicyclist comfortably operates away from the separator and so as to avoid pedal strikes was factored in and considered in the usable space conversation with PBOT. The County commits to continuing this coordination with the City on these topics in advance of, as well as during, the Final Design phase.	Adrian Witte
109634	Social and Neighborhood Resources	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC)	[less room for active transportation than currently exists] and is likely to be a particular problem at the Portland Rescue Mission, where sidewalks are well used by people utilizing the social services provided.	Thank you for your comment. As described in the Social/ Neighborhood Supplemental Memorandum, the Refined Long-span Alternative's sidewalk and bicycle lanes provide more space than the current bridge, however it is less than Draft EIS Long-span Alternative. Ongoing discussions will continue with the surrounding social service providers throughout the duration of the project.	Sabrina Robinson
109635-1	Transportation - Long term traffic, freight & transit	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC)	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 members, 10 feet should be considered adequate: 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 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. General purpose travel lanes should only be 10 feet wide and a low, camera enforced, speed limit is also encouraged. We are pleased to see the active provisioning of space for transit in the westbound direction. In February 2020 Portland City Council unanimously voted 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. (...continued in 109635-2)	Comment acknowledged. The County and its project team are working with PBOT and other stakeholders (including TriMet) on determining the best allocation of space and the appropriate width for travel lanes and active transportation space. This will be reflected in final design and will consider operating envelopes for buses and trucks and the consideration of a westbound bus lane.	Adrian Witte

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109635-2	Transportation - Long term traffic, freight & transit	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC)	(...continued from 109635-1) 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. As noted in the Transportation Supplemental Memorandum5, 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 is implemented by the future year date."6 Given this likelihood, we support the inclusion of a westbound transit lane 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 enable the project to fulfill its role as a primary route 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. We also know that 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. For all of these reasons, the default allocation of a lane solely for transit is a commendable change to the SDEIS. 6 Earthquake Ready Burnside Bridge - SDEIS - Transportation Supplemental Memo, page 17-18 5 Earthquake Ready Burnside Bridge - SDEIS - Transportation Supplemental Memo, page 17 4 "Map 5: Rose Lane Project Corridors And Spots." Rose Lane Project Report, https://www.portland.gov/sites/default/files/2020-06/rose-lane-plan-final-2.13.2020-low-res.pdf 3 "Lane Width." NACTO, accessed March 8th, 2021, http://nacto.org/publication/urban-street-design-guide/street-design-elements/lane-width/	Comment acknowledged. The County and its project team are working with PBOT and other stakeholders (including TriMet) on determining the best allocation of space and the appropriate width for travel lanes and active transportation space. This will be reflected in final design and will consider operating envelopes for buses and trucks and the consideration of a westbound bus lane.	Adrian Witte
109636	Active Transportation Access Options	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC)	Connections to the pedestrian and bicycle network at each end of the bridge 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. 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. We are concerned, however, that only options with an elevator or ramps are being considered7, and we urge the committee to pursue a vision that prioritizes resilience and access for both wheelchair users and bicyclists. For example, given the significant height difference between the Esplanade and the bridge deck, elevators would be ideal 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. Please include elevators and ramps for people to walk and roll. At the west side of the bridge, we support the in-kind replacement of the existing stairs (where space constraints preclude a ramp) and new ramps on the south side. We prefer the options at the Mercy Corps Site over the Saturday Market Admin Site. The Mercy Corps Site provides the same access to the MAX station, with better access to Naito Parkway. We prefer the first layout due to the lesser grade on the ramps, which will be easier for people with mobility issues to use. Placing ramps on the Mercy Corps Site makes future redevelopment of the Saturday Market Admin Site and adjacent surface parking lot more feasible; an important consideration in ensuring a more pedestrian-friendly and transit-oriented Old Town. At both the east and west sides of the bridge we support options that provide signalized crossings of the bridge. Any staircases should have robust bicycle gutters incorporated into them for easy transport regardless of wheel width. When bicyclists use the stairs, they need gutters to roll their bicycles up or down the stairs.	The Preferred Alternative of the FIES/ROD includes multiple connection options for the west side of the bridge. The exact options will be determined during the Final Design phase. For the east connection to the Eastbank Esplanade, within 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 Drahota

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109637-1	Transportation - Short term bike, ped & ADA	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC)	Pedestrian and bicycle access during construction The BAC/PAC recognizes that a project of this scale cannot be undertaken without disruption. A key east-west route will be closed for four and a half years if no detour bridge is built. Given this disruption, it is important that the project does not have a compounding effect on travel in the north-south direction. Closures should be limited in duration, and, when necessary, detours should be of the highest quality. We are particularly concerned about the 1.5 years of cumulative closure of the Eastbank Esplanade increasing to 3.5 to 4.5 years if the "project builds ramps rather than elevators and stairs for the ADA/bicycle/pedestrian connection."8 This is in sharp contrast to I-5, where work avoids an impact to the extent that it wasn't even called out in this SDEIS.9 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. It is therefore unacceptable to close the path for any length of time and a tunnel or covered sidewalk must be constructed as would be done if a high rise were to be built on a street to protect a sidewalk in downtown Portland, or another city that prioritizes pedestrian movements, so the path remains open 24/7. 9 Earthquake Ready Burnside Bridge - SDEIS - Transportation Supplemental Memo, page 6 8 Earthquake Ready Burnside Bridge - SDEIS - Transportation Supplemental Memo, page 5-6 7 Earthquake Ready Burnside Bridge - SDEIS - Transportation Supplemental Memo, page 47 to 49 (continued in 109637-2)	Comment acknowledged. Detour routes have been determined in cooperation with PBOT and included in the FEIS. The project team has also worked with PBOT and other partners to identify a low-stress active transportation detour route that uses separated pathways on the Morrison and Steel Bridges and in Waterfront Park or Better Naito Forever to provide a shorter, more direct, and low-stress detour than through the Central Eastside Industrial District. The County commits to continuing this coordination with the City on this topic in advance of, as well as during, the Final Design phase.	Adrian Witte
109637-2	Transportation - Short term bike, ped & ADA	Portland Bicycle Advisory Committee & Pedestrian Advisory Committee (BAC/PAC)	(continued from 109637-1) 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. The project should provide mitigation for closures, such as building out the bicycle network on SE Water Ave10 and SE/NE 7th Ave11, as planned by Central City in Motion. 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 described in the original DEIS12. Any closures of the Eastbank Esplanade should be planned so that they do not coincide with the closure of Naito Parkway on the other side of the river.	Comment acknowledged. Detour routes have been determined in cooperation with PBOT and included in the FEIS. The project team has also worked with PBOT and other partners to identify a low-stress active transportation detour route that uses separated pathways on the Morrison and Steel Bridges and in Waterfront Park or Better Naito Forever to provide a shorter, more direct, and low-stress detour than through the Central Eastside Industrial District. The County commits to continuing this coordination with the City on this topic in advance of, as well as during, the Final Design phase.	Adrian Witte
109643	NEPA Process	Jake Belan	In general, this SDEIS is comprehensive and is described concisely. The cover sheet includes all required items of the NEPA recommended format, according to 40 CFR 1502.11, except that it exceeds one page. The executive summary effectively explains the SDEIS by addressing the four build alternatives. The summary discusses the disputed issue of high construction costs and explains its resolution through the Refined Long-span Preferred Alternative, to reduce construction costs. Each of the alternatives are thoroughly listed and differentiated.	Comment acknowledged.	Shane Phelps
109644	Comment noted	Jake Belan	The purpose of the Earthquake Ready Burnside Bridge Project is to create a seismically resilient passage over the Willamette River that would continue to be operational following the events of the next Cascadia Subduction Zone (CSZ) earthquake in Portland, Oregon. The executive summary adequately explains the risks associated with the Cascadia Subduction Zone earthquake and the probability for the next occurrence with reference to the Oregon Seismic Safety Policy Advisory Commission (OSSPAC). The summary explains how a feasibility study concluded that Burnside was the best location to create an earthquake ready bridge that meets the proposed action's purpose and need.	Comment acknowledged.	Steve Drahota
109645	NEPA Process	Jake Belan	The executive summary of the SDEIS was 43 pages, although 40 CFR 1502.12, states that the summary normally will not exceed 15 pages.	The phrase "The summary normally will not exceed 15 pages" allows for a discretionary length for the executive summary.	Shane Phelps
109646	Comment noted	Jake Belan	Considering the extensiveness of the proposed project, the length of the executive summary is adequate. This letter is organized into sections including: Proposed Action and Alternatives, Impacts and Mitigation Measures, and Discussion of the SDEIS for Decision Making. Proposed Action and Alternatives Chapter 1 of the Earthquake Ready Burnside Bridge SDEIS explains the purpose and need for the proposed project. The SDEIS adequately explains the underlying purpose and need to which the lead agency is responding in proposing the alternatives including the proposed action, according to 40 CFR 1502.13. The purpose of the project clearly explains how the undertaking of the proposed action is to provide emergency response in the event of the Cascadia Subduction Zone earthquake. The need for the project is presented by explaining the frequency and magnitude of the Cascadia Subduction Zone earthquakes before stating how all of the older bridges crossing the Willamette River are expected to experience seismic damage after this earthquake.	N/A	Steve Drahota

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109647	NEPA Process	Jake Belan	The presentation of the Purpose and Needs section (Chapter 1) of the SDEIS is written in a way that eliminates the potential for alternative locations of the proposed project. The need for the proposed action is missing information regarding the moderate to high potential of landslides along the Burnside Bridge according to the Oregon HazVu by the Oregon Department of Geology and Mineral Industries (DOGAMI). The Purpose and Need section (Chapter 1) only explains how the Sellwood Bridge is landslide-prone, but does not mention how the Burnside Bridge is also landslide-prone. Without this information, the Purpose and Need section prompts the lead agency to consider a narrow range of reasonable alternatives. There is also no discussion or studies examining the potential for earthquake-related blockages on Burnside Street from buildings in the SDEIS, there is only information for overpasses or viaducts. The description of the proposed action is not easily understandable because it is spread out within the Cover Sheet, Executive Summary, and the Purpose and Need sections. The proposed action is adequately explained in the SDEIS, but the majority of the information is located in the Executive Summary.	The SDEIS and DEIS alternatives are all located at the existing Burnside Bridge location because an alternate location would not support the purpose of the project, which is to create a seismically resilient Burnside Street lifeline crossing of the Willamette River that would remain fully operational and accessible for emergency responders, cars, trucks, buses, bikes and pedestrians immediately following the next Cascadia Subduction Zone (CSZ) earthquake. This is noted in Sections S.1 and S.2 of the DEIS and SDEIS Executive Summaries, as well as Chapter 1 of the DEIS and SDEIS. Discussions of seismic conditions are contained in various sections of the DEIS/SDEIS text and supporting technical reports and notably in the Geology section of Chapter 3 of the DEIS and SDEIS, as well as the Geology and Geotechnical technical reports. Alternative crossing locations were evaluated in the Feasibility Study, which is located at https://www.multco.us/earthquake-ready-burnside-bridge/feasibility-study-archive.	Shane Phelps
109648	Comment noted	Jake Belan	The feasibility study and the evaluation process have been effectively documented in the SDEIS to identify and screen for potential alternatives. The evaluation of alternatives adequately presents the environmental impacts and costs, while meeting the project's purpose and need statement. The Preferred Alternative was determined to be the Replacement Long-span Alternative with potential design refinements with no temporary bridge. The range of alternatives that satisfy the agency's purpose and need are adequately examined including the No-Build Alternative. The potential impacts and consequences of the No-Build Alternative and the Build Alternatives are clearly described in the Executive Summary and in Chapter 3.	N/A	Adrian Witte
109649	NEPA Process	Jake Belan	For each of the alternatives examined in detail, the depth of analysis was approximately the same to allow reviewers or evaluate their comparative merits, according to 40 CFR 1502.14(b).	Comment acknowledged.	Shane Phelps
109650	Comment noted	Jake Belan	Mitigation measures are briefly described in the Executive Summary, but are comprehensively explained in Chapter 3 of the SDEIS.	Comment acknowledged.	Steve Drahota
109651		Jake Belan	Impacts and Mitigation Measures The Chapter 3 Affected Environment section adequately describes the environment of the areas to be affected or created by the proposed action and alternatives, according to 40 CFR 1502.15.	Comment acknowledged.	Shane Phelps
109652	Comment noted	Jake Belan	Multiple data sources were used to identify the affected environment and to analyze the impacts. The areas of potential impact (API) adequately represent the boundaries for the evaluation of effects that are caused by a given action or design aspect of the alternatives. The SDEIS thoroughly describes the extents of the direct API for the proposed project as Safety, Bicycle & Pedestrian, Traffic, Transit, and Freight. The potential indirect API is briefly described to occur as a result of the construction phase. All direct and indirect APIs are adequately represented on maps with the boundary lines of each specific area of potential impact. The existing conditions include a comprehensive traffic volume and intersection analysis to establish baseline conditions associated with transportation. Existing conditions for the other topics are adequately evaluated and determined. The potential impacts are extensively described along with their proposed mitigation measures. Comprehensive discussion of the mitigation measures is difficult to find because they are briefly explained throughout various technical reports. ? Transportation: all potential impacts on transportation are identified and described. The impacts of each alternative bridge option are thoroughly examined to determine the level of intensity on Safety, Transit, and Active Transportation. The potential impacts after the Cascadia Subduction Zone earthquake are also adequately explained for each alternative bridge option. The impacts from construction traffic management options are identified and quantified data tables are used appropriately. The SDEIS also discusses the impacts of a temporary bridge to improve transportation. The various mitigation measures are adequately explained for the Transit, Active Transportation, and Safety modes.	Comment acknowledged.	Steve Drahota
109653	Vegetation, Wildlife and Aquatic Resources	Jake Belan	Transportation Technical Report could benefit from using Oregon Department of Transportation (ODOT) TransGIS data. There is no mention of the impacts on transportation, if swallows or peregrine falcons lay an egg on the bridge, according to the Migratory Bird Treaty Act (Attachment F-6).	Impacts to birds and discussion of the MBTA are addressed in DEIS Section 3.16 - Vegetation, Wildlife, and Aquatic Species, as well as the Vegetation, Wildlife, and Aquatic Species Technical Report.	Rachel Barksdale
109654	River Navigation	Jake Belan	Navigation: the potential impacts for the alternatives including the No-Build alternative are clearly stated and discussed. Impacts from vessel collisions on the bridge were noted and mitigation measures were proposed. Other mitigation measures were proposed to improve river navigation for small recreational crafts and large vessels.	Comment acknowledged.	Shane Phelps

Comment ID	Topic	Comment By	Comment	Response	Response By
109655	Vegetation, Wildlife and Aquatic Resources	Jake Belan	There is no mention of how the construction of the bridge could create a nesting habitat for migratory birds, which are protected under the Migratory Bird Treaty Act (MBTA). Swallows have been known to nest on bridges. If bird management activities are not successful and an egg is laid, there are prohibitions for disturbance until chicks fledge or the nest is determined to have failed (Attachment F-6). If an egg is laid disrupting construction operations, there would be potential impacts on economics, transportation, public services, and social & neighborhood resources. The mitigation measures are briefly explained and are compliant with the applicable requirements. This section can benefit from including more detailed discussion of reasonable and prudent measures for aquatic species to minimize the impact of the amount or extent of incidental take (50 CFR 402.02).	Multnomah County has its own contract with APHIS that would implement measures to prevent birds protected under the MBTA from laying eggs on the bridge. For more detail on the MBTA, refer to the Vegetation, Wildlife, and Aquatic Species Technical and Supplemental Reports.	Rachel Barksdale
109656	Wetlands and Waters	Jake Belan	? Wetlands & Waters: the potential impacts on waters and wetlands are adequately identified and explained. Appropriate scientific methods were used to evaluate each impact from the proposed project. Mitigation measures for unavoidable impacts to waters due to in-water work were minimally explained why they are unfeasible. Other mitigation measures were adequately presented and compliant with regulations and requirements.	The FEIS/ROD for this project contains the final mitigation measures developed in coordination with city, state and federal agencies and as required by related permits and approvals. Please see the Wetland and Waters Technical and Supplemental Memoranda for more information.	Shane Phelps
109553	Comment noted	Mia Bolte	I am Mia Bolte. I am a 22 year old college student with a minor in sustainability and my education background includes Portland's own Sunnyside Environmental Middle School. Environmental protection is a critical part of my value system, as it is for so many others in our community. I am currently working in grassroots policy work, and my major is in Urban and Public affairs so I understand the intersectionality of environmental protection and government/policy as well as growing up and living here giving me particularly relevant insight, this being said to contribute to my credibility and establish myself as a member of the community. I have concerns about the project but also there are things I am quite appreciative of and want to give credit where credit is due to ensure the continuation of these considerations in future projects. Firstly, I would like to shout out the number of alternatives considered in this project. I pretty quickly came to favor the retrofit and long span alternatives	Comment acknowledged.	Shane Phelps
109554	Environmental Justice and Equity	Mia Bolte	My top concerns for this project are the social justice impacts specifically regarding the homeless population and related services, the Burnside skatepark, and the Saturday market. [Retrofit] however would require the temporary closure of Portland rescue mission unlike the Refined long span alternative. We are in the middle of a houseless social justice crisis, adverse effects on the most vulnerable population is not something I can endorse. Multnomah county keeps creating policies and actions that are further marginalizing our houseless population and contributing to the houselessness crisis.	The FEIS Preferred Alternative does not require temporary closure of Portland Rescue Mission, thereby avoiding impacts to its services to houseless populations. Please see the EJ mitigation measures included in FEIS/ROD.	Eduardo Montejo
109555	Comment noted	Mia Bolte	The sections I took into the most critical of considerations from the draft were the Climate change, and the Social services, Environmental Justice and Equity impacts sections. I also heavily focused on chapter 3 and read the full version outside of the summary, and gathered a lot of my information and considerations from there.	Comment acknowledged.	Shane Phelps
109556	Sustainability and Climate Change	Mia Bolte	For the climate change impacts I concluded that the refined long span alternative would have the most positive impacts; due to the removal of a vehicle traffic lane and future prediction for the highest reduced GHG emissions by 2045. Retrofit was only marginally different in regards to future GHG emission predictions	Comment acknowledged.	Shane Phelps
109557	Transportation - Long term bike, ped & ADA	Mia Bolte	A separate thing that pushes me to support the refined long span alternative is the considerations for ADA and pedestrians/ cyclists. That is why I am glad that it is the preferred alternative and urge it to stay that way.	Comment acknowledged.	Lewis Kelley

Comment ID	Topic	Comment By	Comment	Response	Response By
109558	NEPA Process	Mia Bolte	Concerns I have other than highly prioritizing marginalized communities such as the homeless population are criticisms on the accessibility of the DEIS itself. The time and ability for civic engagement is a privilege and there are things you can do to improve the efficacy of your project, and public engagement, which is in my opinion the most important part of the NEPA process. I would recommend providing the impacts for all the main alternatives in the impact sections of the summary so it is easy to compare. There were a few times where I was wondering what the impacts would be for certain alternatives in different impact sections. I do appreciate you having a direct comment section on the DEIS page, and also including what you are looking for. Agencies not including the kinds of language or feedback they are looking for is a tool to further marginalize and silence the people's voice. I know there are certain things that qualify comments for consideration but the public does not.	The project has had, and continues to have, a robust public engagement process. Please see Attachment K of the DEIS and SDEIS and Chapter 5 of the FEIS, Summary of Public Involvement and Agency Coordination. Regarding a summary of impacts for the project alternatives, Section S3 of the Executive Summary provides a relative comparison of the project alternatives listed by technical discipline.	Shane Phelps
109559	Comment noted	Mia Bolte	In conclusion I am supportive of the long span or refined long span alternative/ preferred alternative because it has the least adverse effects to the skate park, Saturday market and most importantly to the houseless population as well as the environment. Of course that is other than the no build alternative but due to the impending earthquake(s) I think the ends justify the means. Please consider my comment and keep the considerations of environmental and social justice at the front of this and all other projects. -Mia Bolte	Comment acknowledged.	Shane Phelps
109560	Comment noted	Nicolas Petersen	Hello! My name is Nic Petersen, and I'm an Emergency Management and Community Resilience Masters Student at Portland State University; I'm also a life-long Portlander and disaster responder of 14 years, with 8 of those years in Portland NET. I have 2 comments:	N/A	Shane Phelps
109561	Transportation - Long term bike, ped & ADA	Nicolas Petersen	In regards to pedestrian and bicycle facilities (Ch. S4, pg. S-32), there is reference to a narrower bridge width with "40 feet of cross section dedicated to bicycles and pedestrians". I would propose that instead of making the pedestrian/bicycle access suspended on the bridge, there be 2 floating pontoon bridges on either side of the bridge going across the river. The impetus for this is based on post-earthquake activity: even with a safer bridge, there will still be damage impeding access to transportation, and having civilian/pedestrian access across the water will clear the bridge itself for emergency transport use.	"Comment acknowledged. Bridge options that included separate, twin-bridge configurations that separated bicycle and pedestrian users from vehicles onto their own bridge were examined during the Feasibility Study phase of the project. Options that placed bicyclists and pedestrians on their own bridge were and screened out from moving into the NEPA phase. Additionally, floating pontoon bridges were dismissed due to there being a height differential between east and west street network connections and having the freeway and UPRR in the way. Floating pontoons also do not meet the purpose and need of having a long-term solution in place. In the event of an earthquake, the build-options would likely provide active transportation access across the river before full vehicle access following guidance from local and state earthquake resiliency plans."	Lewis Kelley
109562	Transportation - Long term traffic, freight & transit	Nicolas Petersen	On page S-28 of Chapter S3, the plan states that as part of the climate change consequences, "The Refined Long-span, however, with one less vehicle lane on the bridge, is modeled to cause minor traffic diversion to other bridges and increase congestion in some locations which would result in slightly higher GHG emissions than the other alternatives. With or without the project, future regional GHG emissions are predicted to be significantly lower than today because of expanded public transportation options". I draw attention to the 'expanded public transportation options' section, and am wondering if there is a design similar to the Tillicum bridge (Streetcar and bus access)?	Comment acknowledged. There is no design for the Burnside Bridge that includes only transit and active transportation modes, please refer to the Project Alternatives section of the FEIS for descriptions of the bridge alternatives. The future year GHG calculations were completed for 2045. In 2045, expanded public transportation options will be available across the Burnside Bridge including the potential for increased levels of bus service and new streetcar service over the Burnside Bridge.	Lewis Kelley
109563	Comment noted	Matthew Kirkpatrick	Please use the cable stayed option. It looks way better.	Comment acknowledged.	Shane Phelps
109564	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation	General: : : See separate memo providing justification for a minimum of 17' ped/bike width on the bridge	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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 SDEIS analysis. The County commits to continuing this coordination with the City on this topic in during the Final Design phase.	Adrian Witte
109565	Project Cost	Alex Lamb	How about saving up our public resources in order to build a bridge with one MORE traffic lane than we think we need, rather than one less lane?	Comment acknowledged. As discussed in the SDEIS in Ch. 3, analysis shows that a 4-lane bridge can adequately meet transportation needs with some short duration congestion at peak periods.	Steve Drahota

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109566	Purpose and Need	Alex Lamb	For emergency and community restoration use, more lanes would be far better since there would be less regular commuting but more transportation of construction materials and workers for many years. The design team has not shown that their bridge concepts map well to the rebuilding phase following an earthquake on the PSZ. I have seen no information, for example, about how far west on Burnside driving would be possible. Is this a “bridge to nowhere”?	Understanding that Burnside Street is a regional lifeline route, it is assumed that others will make the routes accessible. It is outside the purview of this Project or Multnomah County to dictate emergency service or changes to City facilities or private properties outside the limits of the Burnside Bridge.	Steve Drahota
109567	Active Transportation Access Options	Daniel Soebbing	I feel strongly that there should be an ADA compliant ramp from the East bank esplanade to both the east bound and west bound lanes of Burnside. Stairs and an elevator are not adequate to serve this purpose. It needs to be a ramp.	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 Drahota
109568	Hazardous Materials	(BES) Bureau of Environmental Services, John O'Donovan	Hazardous Materials Supplemental Memo: General: : Due diligence for property / easement is mentioned but not the method (i.e. ASTM Phase-I). It would be a good idea to conduct a linear Level II environmental site assessment(conduct environmental borings and analysis of soil and groundwater) before construction in those areas where they anticipate excavation, trenching, dewatering etc. Use the results to develop a contaminated media management plan (CMMP) before construction. They mention encountering contamination "during construction". Much better to have that information before construction. It is much better to have the future excavation spoils pre-characterized for management, worker protection, and disposal options.	The due diligence method for property acquisition is ASTM E1527-21 (Phase I ESA) or Level I HazMat Corridor Study (in ODOT requirements) and will be added as a reference. Agree that Level II ESA can be conducted before construction and is preferred in many circumstances. Language has modified to indicate that Level II work may be completed prior to construction to support development of a project-specific CMMP. Please see FEIS Chapter 2 Errata Table of Changes to DEIS.	Rick Wadsworth
109569	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.3: 43: : All three widths include the statement "PBOT recommends a minimum active transportation space of 17-feet". This is actually not a sufficient width when considering the need for shy or frontage zones to the walls along both the pedestrian and bicycle spaces. These sections should reference the actual standard widths, rather than a width PBOT has indicated is a supportable compromise. It is fine to say that PBOT indicated support for the 17-foot width as a compromise.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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. The statements indicating PBOT minimum standards have been edited to indicate "PBOT support for 17-foot widths"...	Lewis Kelley
109570	Environmental Justice and Equity	(PBOT) Portland Bureau of Transportation, Lisa Strader	EJ Supplemental Memo: Page 24: List of DEI & EJ organizations: As the project continues with outreach, please consider expanding this list to include more organizations serving people with disabilities such as Disability Rights Oregon, American Council of the Blind local chapters, Independent Living Resources, Deaf HOPE and others.	Thank you for your comment. The DEIS and FEIS specifically note the social service organizations directly impacted by the Preferred Alternative (Portland Rescue Mission, Salvation Army, etc.) The County is committed to continuing coordination with relevant non-profit social service organizations in advance of, as well as during, the Final Design phase, including those who represent disability organizations.	Eduardo Montejo
109397	Comment noted	Restore Oregon, Nicole Possert	To Whom It May Concern: Thank you for the opportunity to comment on the SDEIS for the Earthquake Ready Burnside Bridge Replacement Project. We support most of the changes proposed for the new project’s preferred alternative as these changes reduce the impact of the proposed new bridge on the Skidmore Old Town National Historic Landmark district.	Comment acknowledged.	Shane Phelps
109398	Archaeological and Historic Resources	Restore Oregon, Nicole Possert	However, we are still concerned that the complete removal of the historic resource itself, the designated Burnside Bridge, in Section 3.11 is woefully inadequate in both the SDEIS and the draft DEIS. The analysis should provide data and information to assist with establishing mitigation that is commensurate with the value of the resource and if those mitigation measures are commensurate with the scale and effect of the project. The scale and effect of the total loss of the Burnside Bridge is enormous. The description of the bridge does not address the unique character of this bridge among Portland’s downtown bridges, how it resides within the boundaries of the National Historic Landmark and is individually listed NRHS, how it is part of the social and neighborhood fabric and history of social movements in Oregon, etc. Nor does this document sufficiently identify how some of the impacts need to be addressed or what mitigation is required to offset the worst adverse effect, the complete and total loss of this historic resource.	Addressed in DEIS Errata. Section 3.11.1 includes a more robust description of the importance of the bridge and its character. This importance has been recognized in more fully developed mitigation measures that have been defined in the Project Programmatic Agreement, which reflects mitigation measures recommended in meetings with the Consulting Parties. The bridge is situated within the boundaries of Skidmore/Old Town NHL District but is not a contributing resource in the District as it falls outside the period of significance.	David Ellis

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109399	Archaeological and Historic Resources	Restore Oregon, Nicole Possert	None of the additional mitigation measures in the SDEIS include the possibility of retaining/re-using existing character-defining bridge elements. The project team at the Section 106 meeting in March 2021 had this potential mitigation in their presentation (see below snippet from presentation deck) and therefore Restore Oregon requests that the SDEIS be revised (and/or the Final EIR report) to include and be consistent with what the project team has presented. Please include a potential mitigation measure: the reuse of character-defining features of the Burnside Bridge may be incorporated into the new bridge design. Historic bridge components that are meaningful character defining features include, but are not limited to, the operator towers, various railings, etc. The 1920's bridge is designed as a civic object, unlike earlier Portland bridges it is not solely an engineered object. The operator towers are not simply utilitarian—they are designed as pieces of art and architecture. Integrated into the tower's design are covered areas for pedestrians waiting while the bascule sections are open. The railings of the bridge received similar detailed attention. None of the additional mitigation measures in the SDEIS include the possibility of direct support for seismic resiliency on other historic structures in the Area of Potential Impact or the Skidmore/Old Town National Historic Landmark district. Restore Oregon, the City of Portland, NPS and others have verbally requested and commented on a potential mitigation measure of direct seismic assistance either to the NHL district or within the adverse impact APE on several occasions to the project team. Restore Oregon requests that these comments be incorporated into Section 3.11.3 (Mitigation for the Demolition of the Burnside Bridge) of the Final EIS as an additional mitigation idea - "seismic resiliency education, seismic planning and retrofitting buildings in Skidmore/Old Town National Historic Landmark." It is appropriate that mitigation to improve earthquake resiliency is a valuable way to ensure mitigation is commensurate with the scale and effect of the project, considering its overall goal is buildings impacted by the project have no evidence of being seismically retrofitted – Bates, Burnside Hotel, Salvation Army, etc. Documentation for this request to add this mitigation idea to the final EIR comes from at least three meetings of the Section 106 Consulting Parties where this potential mitigation measure has been discussed in various ways including an "action" item after Mr. Hadlow's comment at the November 2020 meeting. Meeting Nov. 2020 - (Project Team File name: Notes_EQRB_Section 106 Consulting Parties_Mtg_01_2020_11_30): Jackson: With the potential impact to vibration to NHL, do you see mitigation to help the NHL to help with those impact in the Programmatic Agreement? Heilman: Yes we do. We still need more information on which buildings have already received seismic retrofits and which haven't. But we have drafted prescriptive Restore Oregon - SDEIS Comment Letter, June 13, 2022 2 Meeting March 2021 - (Project Team File name:Notes_EQRB_Section 106 Consulting Parties_Mtg_03_2021_03_30): Peggy Moretti: Who establishes the budget? Restore Oregon challenges mitigation which is only documentation, instead, redirecting mitigation to other public needs (i.e. enhance nearby neighborhoods). Hillary Adam: an example of mitigation including other historic structures would be to seismically retrofit buildings in Skidmore. There are potential FEMA dollars to support that work. The DEIS also notes the potential for vibration impacts on the Unreinforced Masonry Buildings in Skidmore/Old Town which seems to imply a need for seismic retrofits adjacent to the bridge prior to construction.	Comment acknowledged. The Project Programmatic Agreement (PA) states the County "will explore options for salvage and reuse of existing features of the Burnside Bridge, including railings, mechanical components, and the operator towers." The PA defines a rigorous process for determining if there could be adverse effects during demolition and construction to any other historic properties. If any such effects are defined, the County would be required to mitigate for those, which could include seismic retrofit.	David Ellis
109400	Social and Neighborhood Resources	Restore Oregon, Nicole Possert	Bob Hadlow: Currently, there is not a set budget for the project. ACTION: Consider adding seismic retrofitting buildings in Skidmore as a potential mitigation measure. Peggy Morretti follow-up: any option will have impacts to the NHL district; therefore, there will	The Section 106 Programmatic Agreement contains guidelines and stipulations for minimizing, monitoring for, and preventing vibration damage to adjacent unreinforced masonry buildings.	Sabrina Robinson
109401	Sustainability and Climate Change	Restore Oregon, Nicole Possert	Section 3.21.16 - Though expanded in detail from the DEIS, comprehensive climate change issues, previously noted by Restore Oregon, including those related to the projects carbon footprint, which could have substantial impact on project cost as they relate to fundamental alternate options are not fully addressed. Instead, the focus is on possible short term air/water quality and effects on flora, fauna, flooding. We still request further analysis on the full life-cycle of the new project, including the calculation for the loss of the embedded carbon in the existing resource, its demolition and the financial impact from this loss.	Embedded lifecycle emissions were completed using FHWA's Infrastructure Carbon Estimator tool. This tool accounts for typical life-cycle effects from construction of major infrastructure project such as the Burnside Bridge replacement. For more details, please see the Climate Change Technical Report.	Scott Noel

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109408	Active Transportation Access Options	Restore Oregon, Nicole Possert	The SDEIS appears to call for the preservation of the bridge sidewalk “Saturday Market” arches and stairs leading down to SW and NW 1 St. . This is important for the ongoing economic viability of retail and other activities in the district. If elevators are added, small structures above the bridge sidewalk for housing the elevator will be required. The SDEIS assumes this is a minor impact. We agree that the impact can be minor, but are interested in how the design will be developed and reviewed.	As part of the FEIS / ROD Preferred Alternative, there are numerous concepts for the West Approach access that will remain under consideration until the Final Design phase, at which time a selection will be made. Design features and exact impacts will be established at that time.	Steve Drahota
109409	Comment noted	Restore Oregon, Nicole Possert	Thank you for reviewing these comments. We assume the project team will have the intention of incorporating these comments by revising the Final SDEIS or Final EIR with our comments in this last step before adoption. If any project team member has questions or needs clarification on any comments, please reach me at the email listed below. Sincerely, Nicole Possert Executive Director [email]	Comment acknowledged.	Shane Phelps
109410	Transportation - Long term traffic, freight & transit	Meghan Taylor	Hi my name is Meghan Taylor telephone number [phone #] calling about the Burnside bridge project draft that you guys are proposing. maybe I'm misunderstanding but it seems like you guys are going to be taking a lane out. I just think that's kind of backwards thinking as opposed to forwards thinking, there are ore people moving here and not everybody rides there bike everywhere. I just think moving forwards people are going to be backed up into traffic and it just sucks so if you would just consider... Not asking you to add more lanes, just have the same amount of lanes when you replace the bridge, and add space for people to bike and walk, because people do drive. Okay thanks.	Comment acknowledged. Please see FEIS Chapter 1, Executive Summary and FEIS Chapter 6, Preferred Alternative regarding decision to select 4-lane bridge.	Adrian Witte
109411	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: Executive Summary: ES-2: : The 9th Transit bullet notes that the 50 and 47-foot cross-sections meet TriMet's lane widths. The 44-foot section should as well, using standard PBOT lane widths of 10 feet for inner lanes, 11-foot outer lanes, and 1-foot shy distance.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of the SDEIS errata chapter of the FEIS. The statement has been edited to reflect TriMet's ability to operate within the narrower cross-section.	Lewis Kelley
109412	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: Executive Summary: ES-2: : The 10th Transit bullet notes that the 44-foot cross-section may impact transit operations and would increase mirror strikes. This seems speculative given the ability to meet lane width standards and should be removed. A similar description in 7.1.3 is written in a more objective manner.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section 3.1.2 of the SDEIS errata chapter of the FEIS. The statement has been edited to reflect that the 44-foot cross section could meet TriMet's minimum standards for an operating envelope for transit vehicles.	Lewis Kelley
109413	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: Executive Summary: ES-3: : Note under Active Transportation that the none of the options meet PBOT's standards for bicycle and pedestrian facility width.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of the SDEIS errata chapter of the FEIS. A note about PBOT standards was added to the statement.	Lewis Kelley

Comment ID	Topic	Comment By	Comment	Response	Response By
109414	Comment noted	Xavier Stickler	Testimony on Design of Burnside Replacement Bridge Hello, My name is Xavier D. Stickler, and I am a student of architecture and planning at Portland State University. Today, I am hoping to offer my thoughts on the Earthquake Ready Burnside Bridge project. I first off want to acknowledge and thank the County and all the staff, contractors, and community members who have come together to move this critical infrastructure project forward. Preparing for the future through seismic resiliency should be a key priority at every level of government in the Pacific NW, and Multnomah County's undertaking of a dedicated seismically stable east-west connection is a fantastic example of a good governance in a time of great difficulty. It is my hope that the public at-large comes to better understand the essential nature this project. I also want to offer my support for the decisions that have been made thus far in the bridge design process: the reduction of a eastbound travel lane, the inclusion of a girder on the west segment that would retain unobstructed views of the iconic White Stag "Portland, Oregon" sign, as well as the selection of a bascule-type bridge are all well-founded cost-saving measures and elements that I feel will lead to a strong design.	Comment acknowledged.	Shane Phelps
109415-1	Visual and Aesthetic Resources	Xavier Stickler	However, even at this early stage, I want to stress the importance that we get this bridge "right." Unlike most major US cities, which skylines are determined by the tallest structures in their downtowns that settled on some open plain, Portland's skyline-our recognizable scenery and shape that identifies us in everything from B-roil film shots, to post cards at Powell's, to artwork sold at the Saturday Market--is our bridges that span the Willamette River. Our bridges are what defines us: visually, culturally, and practically in terms of everyday movement. Each bridge has its own unique character and architectural voice. It's that individuality of each bridge that in fact ties them all together: their recognizability on their own is what helps them carry the collective symbol of the entire city. As such, I believe that we must ensure the Burnside Bridge is given its own voice-one that is reflective of Portland, that embodies current architectural vernacular, and that is immediately distinguishable for its shape, thoughtful finishes and proportions, and its interaction within its context. I understand that a cable-stayed design is under consideration. While I do not object to such a design, I want to make clear that it should be very different than Tilikum Crossing. The Tilikum's pentagonal towers, attention to proportions, and dynamic ratios give it a striking presentation, not only in the context of Portland but also in the style of cable-stayed bridges globally. If you were to compare it to Tacoma's 21st Street Bridge, well-there is no competition as to which is more remarkable. (...continued in 109415-2)	Comment acknowledged. Scale, form, and materials will all be further developed in the Final Design phase of the project. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Josh Carlson
109415-2	Visual and Aesthetic Resources	Xavier Stickler	(continued from 109415-1). Given the cost-constraints of this project, I am concerned that how the bridge defines its position through appearance may fall by the wayside, squandering not only a once in a decade+ opportunity, but also costing the city in the long-run. People, and development, are drawn to beautiful and captivating architecture. Additionally, the likenesses of our bridges compose a critical mass of the commercial and cultural iconography of the city. A good design will be worth every penny. To put it plainly: I think Portland could really use a win right now. Transportation, in particularly, has been taking a beating. The Interstate Bridge Replacement project has been unpopular across the board thus far. The Metro transportation bond was soundly defeated. All the while, there is a consensus in the public consciousness that we don't like the experience that our local transportation system provides. It may be idealistic to believe a symbolic bridge design will change any of that, but I like to think that civic pride is contagious. I believe residents of the region want a bridge that we can be proud of. We deserve a big, visible landmark that reaffirms we are a real city: a place that matters, is creative, is vibrant, and is advancing. With that, I ask you to keep those ideals in mind as the project moves forward .	Comment acknowledged. Scale, form, and materials will all be further developed in the Final Design phase of the project. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Josh Carlson

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109420	Section 4(f)	Portland Parks and Recreation, Brandon Namm	4(f): GENERAL: N/A: No trees will be approved for removal for purposes of project construction staging. Additional discussion is needed to determine whether tree impacts will be approved by PP&R.	The Project has carefully considered construction staging and access options and has selected the option that is the least detrimental to resources overall when considering all factors of construction, timing, equipment, equipment maneuvering areas, etc. The area selected would result in the removal of several trees on the north side of the Burnside Bridge, but the project has adjusted the construction area such that the flowering cherry trees planted on the raised berm north of the bridge will not be impacted. The Project will continue work with PP&R and Urban Forestry regarding tree impacts and mitigation in Final Design.	Jennifer Hughes
109422	Parks and Recreation, Project Cost	Portland Parks and Recreation, Sandra Burtzos	Economic Supplemental Memo: 17: 7.4.1: Trellis refers to an open, airy garden structure to support plants. Use the term pavilion.	This instance occurs in the technical memo not in the SDEIS. Changes to the technical reports 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 SDEIS 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.	Jennifer Hughes
109428	Comment noted	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	The U.S. Environmental Protection Agency has reviewed the Federal Highway Administration's Draft Supplemental Environmental Impact Statement (DSEIS) for the Earthquake Ready Burnside Bridge (CEQ Number 20220058; EPA R10 Project Number 19-0009-FHW). EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA and requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.	N/A	Shane Phelps
109429	Comment noted	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	The DSEIS evaluates the potential environmental impacts associated with proposed construction for the seismically resilient Burnside Street crossing of the Willamette River in Portland, Oregon. The DSEIS analyses and discloses environmental impacts specific to new cost-saving refinements to the proposed project and includes a new Refined Long-span Alternative, FHWA's Preferred Alternative. This alternative includes additional design options to reduce the project's overall construction cost, such as narrower bridge, bike lanes and sidewalks; and four motor vehicle lanes over the bridge instead of the DEIS' five. The Refined Long-span Alternative is anticipated to result in less seismic risk, minimal impacts, and lower overall project construction costs than other bridge replacement alternatives.	N/A	Shane Phelps
109434	Comment noted	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	EPA appreciates the projects primary purpose and need to improve regional emergency systems by addressing the seismic risks to the existing 94-year old Burnside Bridge seismic.	Comment acknowledged.	Shane Phelps
109435	Section 4(f)	Portland Parks and Recreation, Brandon Namm	4(f): GENERAL: N/A: Additional discussion will be required to determine mitigation for tree impacts.	Thank you for your comment. We anticipate specific planting or payment in lieu of planting requirements will be detailed as part of the City of Portland development permits, including Title 11 Tree Code compliance.	Jennifer Hughes
109436	Comment noted	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	EPA notes the DSEIS Preferred Alternative does not include a temporary bridge option and proposed to place the fewest piers in the geologic hazard zone, thus increasing the new bridge's level of seismic resiliency.	N/A	Shane Phelps
109437	Comment noted	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	In addition to our March 2021 recommendations for the DEIS, enclosed are additional EPA recommendations for the Final EIS to include information regarding stormwater management strategies and mitigation for potentially disproportionate impacts to communities with environmental justice concerns. Thank you for the opportunity to provide comments on this DSEIS. 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.	N/A	Shane Phelps
109438	Parks and Recreation	Portland Parks and Recreation	All documents: GENERAL: N/A: More discussion will be required to ensure that operations and maintenance activities, vehicles and equipment, and personnel can access PP&R properties safely (both for staff and for the public) at all times throughout the project. For example, it will be important to be able to turn vehicles around at the Esplanade. The path is quite narrow and there are only a couple locations where trucks can turn around. One of those is a wide area just south of the floating walkway.	The Project will continue to coordinate with PP&R operations and maintenance staff regarding access. It is anticipated there may be intermittent construction events during which access may need to be restricted. Those events will be minimized and coordinated with PP&R.	Jennifer Hughes

Comment ID	Topic	Comment By	Comment	Response	Response By
109439	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Chapter 3: 3-7: : "some ADA advocates have expressed concern that long ramps would be a barrier to many people in wheelchairs or with other mobility requirements, the Refined Long-span Alternative studied in this SDEIS evaluates a refined elevators/stairs option for direct Vera Katz Eastbank Esplanade access. At the same time, bicycle advocates have expressed a preference for the convenience and reliability of ramps over elevators, and some ADA advocates have expressed concern about the safety, reliability, and sanitary nature of public elevators.". This statement is not wholly accurate. many more than just bicycle advocates expressed a preference for a ramp and we consistently heard from all groups concerns voiced about only elevators and stairs being provided given the likelihood of elevators being out of service, whether it be mechanical or safety/security reasons. Recommend revising to indicate many ADA advocates expressed concern....and many advocates/advisor expressed preference for ramps.... and many advocates/advisors expressed concern about only elevators and stairs. It may actually be even more accurate to say most, but certainly not just some.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of the SDEIS errata chapter of the FEIS. Reference to ADA advocates has been removed.	Lewis Kelley
109440-1	Transportation - Long term traffic, freight & transit	Jana Jarvis	Please see attached. | Jana Jarvis President & CEO | | | --- | --- |Attached letter: June 9, 2022 Multnomah County Bridge Services Section Burnside Supplemental Draft EIS 1402 SE Water Avenue Portland, OR 97214 The Oregon Trucking Associations is a statewide trade association representing Oregon s trucking industry. Currently, the Oregon Trucking Associations has approximately 600 members comprised of trucking companies and suppliers to the industry. The members of the Oregon Trucking Associations would like to provide the following comments regarding the Burnside Bridge Supplemental Environmental Impact Statement (EIS).The supplemental EIS is a result of the perceived need to reduce the cost of the bridge because of increasing construction costs, failure of the regional transportation bond measure and competition for funds available for construction of large transportation projects. The goal of the supplemental EIS is to reduce bridge costs by approximately $150 million. The original EIS selected the Replacement Long Span Alternative for eventual construction. This alternative was deemed the best to meet the stated needs for the project which include seismic resiliency, post-earthquake emergency response, post-earthquake recovery and long-term multimodal travel across the Willamette River. Through the supplemental EIS process, the County has selected a scaled down Replacement Long Span Alternative in order to meet the cost reduction objective. This version of the Replacement Long Span Alternative essentially reduces the width of the bridge resulting in 4 vehicle travel lanes rather than 5 and reduced width for bike and pedestrian facilities. Unfortunately, this smaller version of the bridge does not meet all of the stated needs for the project. (continued in 109440-2)	Comment acknowledged.	Adrian Witte
109440-2	Transportation - Long term traffic, freight & transit	Jana Jarvis	(continued from 109440-1) Yes, the new design will be earthquake resilient. However, because of the reduced vehicle capacity, the new design will not provide adequate vehicle throughput to sufficiently aid in earthquake emergency response and recovery. The assumption is that all of the other Willamette River bridges in Portland will be destroyed in the expected severe earthquake. This would leave the Burnside Bridge as the only option to accommodate emergency vehicles during the response phase to a major earthquake. Similarly, it would be the only bridge available during post-earthquake recovery. In no way is the scaled down bridge adequate for the job of responding to and recovering from a major earthquake! Also, the supplemental EIS shows an increase in vehicle crashes with the scaled down bridge vs. the no-build option. This is inconsistent with the region's Vision Zero policy which our members have supported from its inception. The number one consideration for the members of the Oregon Trucking Associations, when evaluating any proposal, is its impact on traffic safety. The scaled down version of the Replacement Long Span Alternative does not meet our safety objectives. (continued in 109440-3)	Comment acknowledged.	Adrian Witte

Comment ID	Topic	Comment By	Comment	Response	Response By
109440-3	Transportation - Long term traffic, freight & transit	Jana Jarvis	(continued from 109440-2) However, where the new proposal really fails is in providing long term multimodal travel across the Willamette River. Not only are the vehicle travel lanes reduced from 4 to 5 but the City of Portland has indicated that they would like 2lanes, one in each direction, dedicated exclusively to transit. This leaves only 2 travel lanes for trucks, automobiles, motorcycles and any other motorized vehicles. The traffic impact analysis actually shows that intersection queuing in the bridge influence area would be similar or worse than the no-build alternative even though the future traffic projections unrealistically indicate a reduction in traffic compared to actual counts observed in 2019. I would be remiss if didn't reference the proposed lane widths. The existing bridge has 3 ten-foot lanes and 2 ten and a half foot lanes. A typical tractor trailer type heavy truck is approximately 126 inches or ten and a half feet wide. While the actual lane widths for the scaled down Replacement Long Span Alternative have not been determined, the available overall width is similar to the existing bridge. I would assume that the lane widths would be similar as well. In contrast, the original Replacement Long Span would have 5 eleven-foot lanes. For safety purposes, we strongly prefer twelve-foot lanes. However, anything less than eleven feet does not give us any room for error. For the reasons stated above, the Oregon Trucking Associations does not support the Burnside Bridge Supplemental EIS. We would recommend that Multnomah County reaffirm its support for the original Replacement Long Span Alternative and seek the necessary funds to construct it. We would be pleased to add our voice in support. Thank you for opportunity to comment. Sincerely, Jana Jarvis President & CEO	Comment acknowledged.	Adrian Witte
109441	Stormwater	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	Stormwater and Impacts of Roads on Salmonid Mortality Stormwater is an extremely complex chemical mixture that may include, among other contaminants, 6PPD1 and tire rubber-derived 6PPD-quinone. There are thousands of chemicals in road runoff (including PAHs, metals, pharmaceuticals, pesticides, and other contaminants of emerging concern), many of which are uncharacterized and have the potential to be toxic. The proposed project activities may impact federal and state protected species occurring in the project area/vicinity, such as threatened Chinook salmon, coho salmon, and steelhead. Coho is a sentinel species with adult coho salmon exceptionally sensitive to the harmful effects of toxic urban runoff.2 Research published in the journal Science3 attributed coho salmon death to an acutely toxic chemical degradation product (6PPD-quinone) from tire particles in stormwater. Concentrations in stormwater were found to be lethal for coho following exposures lasting only a few hours. Additional (forthcoming) research has shown that steelhead are vulnerable, and other species of ESA-listed salmonids tested (e.g., Chinook), are also affected. More recently, the Tian et al. team published that 6PPD-quinone also was 8.3 times more toxic than previously calculated and should be categorized as a “very highly toxic” pollutant for aquatic organisms.4 6PPD-quinone is acutely toxic to coho salmon, is ubiquitous in tires, and no substitute has been identified yet. However, GSI is effective at reducing mortality rates for coho exposed to stormwater, and relatively inexpensive mitigation measures like bioswales can dramatically improve water quality and promote salmon survival.5	The Project has been in and will continue to collaborate with state, tribal, and federal water quality and salmon experts. A Biological Opinion was obtained from NMFS in July 2021 that was the result of analysis documented in our Biological Assessment and extensive coordination with NMFS, ODFW and FHWA fisheries resource staff. The BO includes requirements to avoid, minimize and mitigate for impacts to salmonids and water quality related to construction and operation of the bridge. It should be noted that stormwater from the new bridge will be collected and treated, which will improve water quality over existing conditions.	Cory Gieseke
109442	Economics	Portland Parks and Recreation, Sandra Burtzos	Economic Supplemental Memo: General: : May have missed this, or it may be covered in draft EIS version, but did not see economic impacts to PP&R, including loss of revenue from many events, races, runs, Saturday Market, etc., that will be impacted.	This impact was addressed in DEIS (see Section 3.5.3).	Ewa Tomaszewska
109443	Stormwater	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	Given the project’s potential impacts stormwater, EPA recommends the FEIS: • Identify and evaluate the environmental impacts (including stormwater runoff and the potential for treatment of such runoff) of parts of the project, including areas where traffic will be diverted during construction and construction staging areas, that discharge directly into the water and/or do not currently have stormwater treatment.	Addressed in the DEIS. The Project will comply with all local, state and federal requirements for stormwater treatment via permits and construction BMPs. Sections 3.14.2 and 3.14.3 discuss impacts to water quality. Section 3.14.4 discusses proposed mitigation techniques. Final mitigation measures are included in the FEIS/ROD mitigation table.	Cory Gieseke
109444	Stormwater	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	Given the project’s potential impacts stormwater, EPA recommends the FEIS: • Evaluate and utilize bioinfiltration, Green Stormwater Infrastructure (GSI)/low impact development implementation wherever possible and maximizing treatment of road runoff and stormwater best management practices.	Addressed in the DEIS Section 3.14. The project will be designed following the City of Portland's stormwater design hierarchy which prioritizes bioinfiltration and green stormwater techniques when possible.	Cory Gieseke
109445	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.4: : Table 16: Traffic analysis is reported for the SDEIS options as difference from DEIS No Build. Since the SDEIS No Build involves changes to E Burnside/NE Couch, it would seem this should be the basis for comparison.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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 SDEIS analysis. The Supplemental DEIS documents any changes to the analysis since the DEIS, so all traffic analysis results are compared to the DEIS No Build condition.	Emily Welter

Comment ID	Topic	Comment By	Comment	Response	Response By
109447	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Chapter 3: 3-9: 1st paragraph: Although a physical barrier introduces a fixed object, it is worth noting that a "vehicular crash" will certainly be of less severity than a vehicle traversing the plastic wands and hitting a bicycle rider. Also, narrowed lanes tend to slow drivers which typically results in crashes of lesser severity.	Comment acknowledged. The language regarding the barrier and bike/ped crashes is accurate.	Lewis Kelley
109449	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Chapter 3: 3-7 to 3-8: Safety: In each instance that a statement is made that a condition "will" or "would", the verbiage should be revised to read "is predicted to" or "may". These findings are from this particular model and we do not necessarily agree with the findings.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of the SDEIS errata chapter of the FEIS. All language changed to "it is predicted" "it is estimated" etc. where appropriate.	Beth Wemple
109452	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Chapter 3: 3-13: Safety Mitigation: increasing the shoulder width will only encourage people to drive faster which will increase the severity of crashes.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of the SDEIS errata chapter of the FEIS. Edited the text to say wider shoulders would reduce fixed object crashes.	Beth Wemple
109454	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Chapter 2: 2-24: 1st bullet : It should be clarified that the 4-lane options are the only options available to the City from which to select a preference.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of the SDEIS errata chapter of the FEIS. Edited the statement to add clarification of PBOT choosing from the four lane options.	Lewis Kelley
109455	Utilities	Portland Parks and Recreation, Sandra Burtzos	Utilities Revised Technical Report: General: : Reintegrating that the utilities the project will be displacing that serve the park, PSM, PBOT street lights, etc. by replacing the many existing smaller bridge columns with 4 huge ones, a lot of electrical service for the PSM booths will need to be addressed in another way, and that other way should not include dragging on grade electrical cables all over the place. This was an important aspect of the design for the site for PSM was to provide convenient power to the booths without cables having to be strung all over the place on grade. Also not clear in the report that I could find whether the large electrical wall just north of the bridge is intended to stay in tact and in operation. It contains a vast array of services that will need to be accounted for during construction and permanently if it is going to be affected.	Comment acknowledged. The County commits to continue coordinating utility impacts during the Final Design phase.	Cory Burlingame
109456	Utilities	Portland Parks and Recreation, Sandra Burtzos	Utilities Revised Technical Report: Appendices: : Just noting PP&R provided substantial utility plans and as-builts that are not reflected in the appendices.	Comment acknowledged. The NEPA documents do not include mapping provided as they contain confidential information of other utilities such as waterlines.	Cory Burlingame
109458	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.4: : Table 20: Person trips appears to be miscalculated – while EB vehicle trips dropped by about 100, the auto person-trips dropped by 645.	Comment acknowledged. After review, the numbers reported in Table 20 of the SDEIS are correct. The apparent difference between vehicle volumes and person throughput is due to a large change in the Average Vehicle Occupancy (AVO) from the Metro Model outputs for Lane Option 1. The AVO for the EB PM Peak under Lane Option 1 changed more relative to the other Lane Options, thus the change in vehicle volumes resulted in a larger relative change in person trip throughput.	Lewis Kelley
109459	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Transportation Supplemental Memorandum: ES-3: Safety: The crash data is a projection and not a guaranteed outcome and should not be stated as such. The "will statements" should be revised to "may statements" or prefaced by a statement that says according to the modeled data...	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of the SDEIS errata chapter of the FEIS. Text was changed to "it is predicted", "it is estimated", or similar where appropriate.	Beth Wemple
109460	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.7: 94: : Text notes a 260-foot 95%ile queue for the eastbound PM peak, which is caveated at the end of the paragraph. Observed 50%ile queues pre-pandemic were much longer than 260 feet.	Comment Acknowledged. Volumes are forecasted to decrease between Existing Conditions and No Build 2045, so No Build 2045 traffic operations are expected to improve compared to existing.	Emily Welter

Comment ID	Topic	Comment By	Comment	Response	Response By
109461	Visual and Aesthetic Resources	Portland Parks and Recreation, Sandra Burtzos	Revised Visual Resources Tech Report: 58: Girder - Refined Alt: The east span being the only span depicted as having tied-arch or cable-stayed creates an odd aesthetic and lack of architectural / urban design balance and symmetry over the river. I understand there has been a lot of analysis and reasons, but are we really considering the architectural focus of the east span over I-5 corridor, framing the freeway, RR, and other east side infrastructure, and not over the river itself, which should be the crown jewel focus? Just one opinion, but it looks like we missed when dropping down the bridge, didn't get it centered on the river. The paragraph in this report refers to: "In the Refined Alternative, this west span option is paired with a tall vertical element on the east span. The varied, asymmetrical scale of the bridge on either side of the river may be viewed as a large impact from existing or viewed as being compatible with the respective sides." Curious as to public's opinion.	Comment acknowledged. See Chapter 5 of the FEIS for a summary of public outreach.	Josh Carlson
109462	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Transportation Supplemental Memorandum: 42: Active Transportation: To provide the widths needed for pedestrians and bicyclists, 17' clear is the minimum acceptable, not the recommended. Also, I think the upcoming AASHTO Bike Design Guide specifies 8' min for bikes when next to vertical barrier.	Comment acknowledged.	Adrian Witte
109463	Visual and Aesthetic Resources	Portland Parks and Recreation, Sandra Burtzos	Revised Visual Resources Tech Report: 125: : The (now 4) proposed huge columns and very heavy feel to the deck do not seem attractive or better than the existing condition under the bridge.	Comment acknowledged.	Josh Carlson
109464	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 7.1.8: 107-108: : Under 'Overall Performance', the statements that say "will" should say "is predicted to". These safety analysis models are predictive models.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of the SDEIS errata chapter of the FEIS. Text was changed to "it is predicted", "it is estimated", or similar where appropriate.	Beth Wemple
109465	Active Transportation Access Options	Stefan Andersson	This project should include a ramp from the Vera Katz Eastbank Esplanade to the bridge for pedestrian and cyclist use. The current stairway is not accessible to people who use wheelchairs or for cyclists. A ramp would be more accessible and provide a much needed link between two vital pieces of infrastructure. An elevator would not be a sufficient option as current elevators that were built as alternatives to ramps are often out of commission (Gibbs Street and Gideon Street specifically) leaving people with long detours to get where they need to go.	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 Drahota
109466	Stormwater	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	Given the project's potential impacts stormwater, EPA recommends the FEIS: • Partnering and supporting regional transportation agencies and Oregon Department of Transportation to develop plans to avoid and/or mitigate impacts to salmon from Oregon's transportation sector. Collaborate with state, tribal, and federal water quality and salmon experts in developing these plans.	The Project has been in and will continue to collaborate with state, tribal, and federal water quality and salmon experts. A Biological Opinion was obtained from NMFS that was the result of analysis documented in our Biological Assessment and extensive coordination with NMFS, ODFW and FHWA fisheries resource staff. The BO includes requirements to avoid, minimize and mitigate for impacts to salmonids and water quality related to construction and operation of the bridge. It should be noted that stormwater from the new bridge will be collected and treated, which will improve water quality over existing conditions.	Cory Gieseke
109467	Visual and Aesthetic Resources	Paul Tibbot	I would like to see seismic retrofit as first option, and second option is short span. If long span is chosen, I like cable stayed. But both will look weird and asymmetrical. Don't do the couch extension.	Comment acknowledged	Josh Carlson
109468	Transportation - Long term traffic, freight & transit	Paul Tibbot	Lastly, I like option 4 of the lane configuration. Two travel lanes each direction. Don't need a bus lane here.	Comment acknowledged.	Adrian Witte
109469	Social and Neighborhood Resources	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	Potential Impacts to Communities with Environmental Justice Concerns To address potential impacts to communities with Environmental Justice concerns, EPA recommends the FEIS: • Include improved measures to minimize the project's impacts to residents staying in the transitional housing and shelters located in the analysis area.	The project team has been coordinating with the City of Portland and EJ stakeholders and service organizations throughout all of the EIS process. Changes to mitigation measures related transitional housing and shelters are reflected in the mitigation section of the combined FEIS/ROD.	Shane Phelps
109470	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Anthony Buczek	Transportation: 8: : Table 50: Additional mitigation measures may be needed to address construction impacts, in particular to address impacts to non-auto modes and to safety impacts of diversion to other bridges.	Addressed in the FEIS. Comment acknowledged. The County has worked with PBOT to develop a list of non-auto mitigation measures including improvements for active transportation on designated detour routes as well as along routes expected to see traffic diversion from the bridge closure and traffic calming measures on neighborhood greenways that could be impacted by spillover traffic. The County commits to continuing this coordination with the City during the Final Design phase.	Adrian Witte
109471	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Roger Geller	Transportation Supplemental Memorandum: 42: : Design posits that the shy distance between two people riding side by side will be less (12") than the shy distance a person will experience riding adjacent to a fixed object (a wall, 18"). This would seem to contradict common sense. A person bicycling will shy further from a wobbling, moving object (a bicycle) than from a fixed object. This guidance also contradicts Portland's design guidance (preferable provision of 8' clear at expected volumes) as well as Portland's field testing of needed passing space.	Comment acknowledged. The County commits to continuing design coordination with the City during the Final Design phase.	Lewis Kelley

Comment ID	Topic	Comment By	Comment	Response	Response By
109472	Environmental Justice and Equity	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	To address potential impacts to communities with Environmental Justice concerns, EPA recommends the FEIS: • Provide information demonstrating the project will ensure there is equitable benefits to all users of the new bridge, including Americans with Disability Act access to the new bridge and related facilities.	The DEIS, SDEIS and FEIS all include discussion of ADA access to the bridge from both the west and east ends of the bridge. Please refer to Ch. 3 of both the DEIS and SDEIS, as well as the Revised Active Transportation Access Options Memorandum. ADA compliance will be carried forward into the Final Design phase.	Eduardo Montejo
109473	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Roger Geller	Transportation Supplemental Memorandum: 42: : The mention of the "minimum of 6.5-feet width" quoted from the Portland Protected Bicycle Lane Planning and Design Guide" ignores the associated footnote, which states: "Carefully consider the environment in which the 6.5-foot bicycling zone is placed. If between two vertical elements (including curbs) there will be a shy distance to consider that might require additional width to provide 6.5 feet of functional width. This can be partially mitigated by using curbs angled back from the bicycling zone and having a shy distance from other vertical elements. It can also be mitigated by providing 7-foot-between vertical elements."	Comment acknowledged. The County commits to continuing this coordination with the City on this topic during the Final Design phase.	Lewis Kelley
109474	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Gena Gastaldi	Transportation Memo: 41: : Reference the 2022 Pedestrian Design Guide	Comment acknowledged.	Adrian Witte
109475	Environmental Justice and Equity	Environmental Protection Agency (EPA), Rebecca Chu, Susan Sturges	To address potential impacts to communities with Environmental Justice concerns, EPA recommends the FEIS: • Provide information demonstrating the project will ensure there is equitable benefits to all users of the new bridge, including Americans with Disability Act access to the new bridge and related facilities. The DSEIS indicates that the Refined Long-span Alternative, with narrower bicycle and pedestrian facilities than previously proposed, will not provide as much benefit to low income or minority bicyclists and pedestrians. The Refined Alternative also eliminates the eastbound bus only lane, resulting in longer bus travel times during parts of the day compared to other options and alternatives. The proposed project may end up not providing any direct connection to the Esplanade and ensure ADA access.	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. Although narrower than some of the previously assessed alternative, the FEIS Preferred Alternative is still anticipated to provide safe and comfortable travel widths for pedestrians, bicyclists, and people in mobility devices to use the bridge and to have safe interactions passing one another by providing 14' to 17' of physically protected walking and cycling space. The bridge will be ADA-compliant along its length and at either end of the west and east approaches. The traffic lane configuration identified in the FEIS preserves the eastbound bus lane only.	Eduardo Montejo
109476	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Roger Geller	Transportation Supplemental Memorandum: 47: : Tilikum Crossing has 14' between barriers for active transportation space on either side of the bridge.	Comment Acknowledged.	Lewis Kelley
109477	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Roger Geller	Transportation Supplemental Memorandum: 47: : Agree that Burnside will operate similarly to Tilikum Crossing. Recent field visit to Tilikum found frequent crossing of people bicycling into pedestrian space and less frequent crossing of people walking into bicycle space.	Comment acknowledged.	Lewis Kelley
109478	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Gena Gastaldi	Transportation Memo: 42: : The 8 ft PTZ minimum width is accurate, but the report isn't adding in the other sidewalk zones that add shy distance to ped zone. Without shy distances, the 8 ft PTZ isn't actually 8 ft.	Comment acknowledged. While the desirable pedestrian space would be 8' plus shy distance to allow three people to walk together or pass others while also being clear of the barrier, the decision to allocate 8' to the sidewalk does allow two people to comfortably walk side-by-side or pass one another plus shy distance from the barrier. It is noted that pedestrian traffic on the bridges is more frequently in the same direction of travel as traffic, resulting in fewer passing needs. An 8' width can accommodate less frequent passing needs though will require more user interaction.	Adrian Witte
109479	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Roger Geller	Transportation Supplemental Memorandum: 49: : Statement about "some ADA advocates have expressed concern" with the "long ramps" is disingenuous in that many ADA advocates have also expressed a clear preference for ramps either instead of or in addition to elevators due to concerns about both security and reliability of elevators.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the changes made to Transportation section of the SDEIS errata chapter of the FEIS. Reference to ADA advocates has been removed.	Lewis Kelley
109480	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Gena Gastaldi	Transportation Memo: 42: : "Physical separation or cane detectable delineation is required between the Pedestrian Through Zone and the bicycle facility so pedestrians with vision disabilities can distinguish between the bike lane and the Pedestrian Through Zone. An acceptable detectable edge shall be adjacent to the Pedestrian Through Zone and may be as narrow as a one-foot tactile material (per Table B-6)" (PDG pg 27) The separator is not included in the 8 ft PTZ, per the Ped Design Guide referenced here.	Comment acknowledged.	Adrian Witte
109481	Archaeological and Historic Resources	Bureau of Development Services (BDS), Hillary Adam	Cultural Resources 7.1: 12: : states: "Changes to the buildings would be conducted according to the Secretary of the Interior's Standards for the Treatment of Historic Properties." It should also be noted that changes may be subject to local historic review with the Skidmore guidelines as approval criteria (similar to what was said about the elevator in an above paragraph).	Addressed in SDEIS errata Section 3.11.2.	David Ellis

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109482	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Roger Geller	Transportation Supplemental Memorandum: 117: Table 50: Including "mode-specific pavement markings" is not mitigation. Markings and color distinction for the bike lanes are standard treatments.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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 SDEIS analysis.	Adrian Witte
109483	Archaeological and Historic Resources	Bureau of Development Services (BDS), Hillary Adam	Cultural Resources 7.8: 19: : states: "The removal of Pier 1 and the associated Harbor Wall railing would affect approximately 150 linear feet of the Harbor Wall. This represents only 3 percent of the total length of the Harbor Wall." It should also be noted what % of the original railing this represents as it is more than3% for that specific element.	Changes to the technical reports 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 SDEIS 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.	David Ellis
109484	Archaeological and Historic Resources	Bureau of Development Services (BDS), Hillary Adam	Cultural Resources 7.11: 23: : It should be noted that changes to the Templeton Bldg. resulting from detaching it from the bridge will be subject to local historic review.	Addressed in SDEIS errata for Section 3.11.2.	David Ellis
109485	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Roger Geller	Transportation Supplemental Memorandum: 38: Figure 10: Why is Figure 10 showing the bicycle lane shifting laterally to the left of the travel lane? That is not a design we would support.	Addressed in SDEIS. Comment acknowledged. The eastbound Bicycle lane is shown as it currently exists, which shifts the bicycle lane to the left of an existing BAT lane that provide Bus-only through movements while allowing general purpose traffic to turn right with the intent to reduce right-hook crashes. The project is not proposing any changes at this location west of 2nd Ave.	Lewis Kelley
109486	Archaeological and Historic Resources	Bureau of Development Services (BDS), Hillary Adam	Cultural Resources 8: 26: : Commit to funding for this mitigation measure identified in the 2021 DEIS Cultural Resources Technical Report: "Coordinate with the City of Portland and Prosper Portland on the Old Town/Chinatown Five -Year Action Plan Extension, 2019–2024, which defines an objective of rehabilitating historic buildings of unreinforced masonry construction. Funding is potentially available for seismic retrofitting of some historic properties."	Under the Section 106 process, funding seismic upgrades of National Historic Landmark buildings is not eligible as a mitigation measure. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	David Ellis
109487	Parks and Recreation	Portland Parks and Recreation, Jennifer Trimm	All documents: GENERAL: N/A: More discussion will be required to outline the County's responsibility for maintenance of PP&R assets, and required maintenance standards (including but not limited to invasive plant species), throughout the project.	The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Jennifer Hughes
109488	Archaeological and Historic Resources	Bureau of Development Services (BDS), Hillary Adam	Cultural Resources 8: 26: : Funding for seismic retrofit should be identified specifically for buildings that are currently attached to the bridge which are proposed to be detached as the bridge may be providing support that is proposed to be removed. This is especially true for the Templeton building which was built to attach to the bridge.	The Project Programmatic Agreement defines specific protocols for identifying historic buildings that could be adversely affected by bridge demolition and construction. The County would be required to mitigate for any potential impacts.	David Ellis
109489	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Gena Gastaldi	Transportation Memo: 49: : "some "ADA advocates have expressed concern about the safety, reliability, and sanitary nature of public elevator". Everyone has concerns about the elevators. The sentence in the report is misleading as we've heard that folks want ramps, in addition to elevators (which pose a safety and maintenance risk)	Comment acknowledged.	Steve Drahota
109490	Archaeological and Historic Resources	Bureau of Development Services (BDS), Hillary Adam	Cultural Resources : 80 (and others)/317 : Figure 2 (Map of APE): Map shows Burnside Skatepark as "listed" in NRHP; it should be shown as "eligible".	Changes to the technical reports written for the SDEIS were not made for the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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.	David Ellis
109491	Utilities	Portland Parks and Recreation, Darryl Brooks	All documents: GENERAL: N/A: More discussion will be required to ensure mitigation of impacts to, protection of, and access to utilities and irrigation at all times throughout the project, for example (but not limited to) the utility hub on the west side of the bridge and the utilities on the east side of the bridge.	Comment acknowledged. The County commits to continuing the utility coordination during the Final Design phase.	Cory Burlingame
109492	Wetlands and Waters	Bureau of Development Services (BDS), Jason Butler-Brown	Wetlands and Waters Supplemental Memo: pdf 7/31 and 20/31: : It appears that volume is being reported in square feet rather than cubic feet. Please verify	Verified. Impacts are provided in square feet (area). Volumes were not available at the time of the Supplemental Memo publication but area and volume will be provided in permit applications.	Rachel Barksdale
109493	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Gena Gastaldi	Transportation Memo: General: : Has the project looked at adding Leading Pedestrian Intervals to the signals as part of this project?	Comment acknowledged. This will be considered in final design and has been considered in mitigation conversations with PBOT. The County commits to continuing this coordination with the City on this topic during the Final Design phase.	Adrian Witte
109494	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Patrick Sweeney	Land Use : Sect 7.1: Table 2, Row 5: ADA access to other facilities….: The ramp connection options to the Eastbank Esplanade currently under development by the City of Portland could end up having a smaller overall footprint than current double stair and elevator and ramp options proposed as seen in Figures 3, 5, and 7 of the Revised Active Transportation Access Options Memorandum. Note the following edits to text in second column Row 5: "New stairs and elevators would improve access for all users. This is an improvement compared to conditions on the existing bridge. The footprint of eastside stairs and elevators option will need to be evaluated with the footprints for ramp options being studied by the City of Portland. Stairs and elevators option would have a smaller footprint than the linear switchback ramp option footprint as seen in Figure 5 of the Revised Active Transportation Access Options Memorandum." This clarification should be made throughout all SDEIS documents.	For the FEIS / ROD, the Preferred Alternative includes "Protecting-in-place" the existing City stairway. The City of Portland will need to evaluate the footprints for ramp options, stairs/elevators or other ADA access provided by the City to access the Eastbank Esplanade from the Burnside Bridge as part of a separate project.	Shane Phelps
109495	Active Transportation Access Options	Jeff Walenta	I strongly believe that we need a ramp to access the Eastbank esplanade from the Burnside bridge. The short term cost in closures is far outweighed by the long term benefits of a connection like that. If we are actually committed to cycling infrastructure in this city then this should be a no brainer.	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 Drahota

Comment ID	Topic	Comment By	Comment	Response	Response By
109496	Section 4(f)	Portland Parks and Recreation, Maya Agarwal	All documents: GENERAL: N/A: Portland Parks & Recreation acknowledges that construction of the Earthquake Ready Burnside Bridge (EQRB) project will result in 4(f) impacts at Governor Tom McCall Waterfront Park, Vera Katz Eastbank Esplanade, Willamette River Greenway Trail, Ankeny Plaza, Japanese American Historical Plaza, Portland Saturday Market; and events, operations, maintenance, and public access to the aforementioned properties. Mitigation for these impacts has not yet been resolved in the Draft Section 4(f) Analysis, and Portland Parks & Recreation and its partners will require additional discussions with Multnomah County to negotiate agreements that will mitigate the project's impacts.	We agree additional discussions and agreements will be necessary. We anticipate that because the Section 4(f) analysis finds parks resources will have a Section 4(f) use and describes minimization and mitigation measures and least harm analysis, Section 4(f) is not the mechanism via which PP&R and the Project will resolve full mitigation. We anticipate mitigation measures will be finalized through the Non-Park Use Permit and other City of Portland required permits.	Jennifer Hughes
109497	Construction Methods	Bureau of Development Services (BDS), Jason Butler-Brown	Seimic Design: General: : It is not clear if elements of the bridge construction will be permitted by BDS under current building code. Building codes require seismic performance based on earthquake ground motions having a 2% probabily of exceedence in 50 years. This may exceed the design ground motions reported in the geotechnical design documents.	Comment acknowledged. Addressed in SDEIS Seismic Design Criteria. Design loads for building structures in the United States are commonly based on ASCE-7 ("Minimum Design Loads for Associated Criteria for Buildings and Other Structures"), with seismic design criteria established in Chapter 11. While a 2% probability of exceedance in 50 years (approximate 2500-yr return period) is considered for building structures, bridge structures are specifically identified as exempt from the seismic design requirements per the scope subsection 11.1.2. Seismic design of bridge structures is governed by AASHTO ("American Association of State Highway and Transportation Officials"), which can be supplemented by more stringent owner requirements. The EQRB project specific design criteria were developed in accordance with the AASTHO LRFD Bridge Design Specifications, the AASHTO Guide Specifications for Seismic Design, the ODOT Bridge Design Manual (BDM), and the ODOT Geotechnical Design Manual (GDM). The cited AASHTO and ODOT design provisions establish an upper level "Life Safety Performance Level" design event with a 7% probability of exceedance in 75 years (approximate 1000-yr return period). In lieu of "Life Safety Performance Level", the EQRB project specific design criteria establish a higher "Limited Operational Performance Level" for this upper-level 1000-yr design event.	Rebecca Bautista
109498	Construction Methods	Bureau of Development Services (BDS), Jason Butler-Brown	Seimic Design: General: : Please verify ADA access facilities will meet collapse prevention or a higher standard under design level earthquake shaking. Please verify the required design code and earthquake ground motions for evaluating liquefaction and lateral spread.	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.	Rebecca Bautista
109499	Public Involvement	Jacob Storm	Attached is a comment letter I am submitting for the open comment period for the Earthquake Ready Burnside Bridge SDEIS, EIS Number 20220058. You are listed as the contact for this EIS process. Please let me know if this email is the proper way to submit this comment letter or if I should submit it elsewhere! Please do not hesitate to reach out with any questions or comments you may have. I am happy to talk! Attached letter: Emily Cline Environmental Specialist U.S. Federal Highway Administration - Oregon Division 530 Center Street NE, Suite 420 Salem, OR 97301 June 8, 2022 Re: Storm - Comment Letter on the Draft Supplemental Environmental Impact Statement (SDEIS) for the Federal Highway Administration Earthquake Ready Burnside Bridge; EIS Number 20220058 Dear Ms. Cline, I am a current graduate student at Portland State University in the Master of Urban and Regional Planning Program. I am just finishing my program and currently taking the course Environmental Impact Assessment. This course has allowed me to learn more about the NEPA process and one of the assignments is to submit a comment letter to an EIS currently accepting public comments. I am delighted to take this opportunity to submit a comment letter on an important project happening in my own city. As an urban planning student, I have accrued a wealth of knowledge and experience in planning for and implementing meaningful public outreach and I wanted to share a few recommendations I have to improve the engagement process for the Earthquake Ready Burnside Bridge project and the SDEIS that is currently open for public comment.	N/A	Jennifer Hughes
109500	Wetlands and Waters	Bureau of Development Services (BDS)	Wetlands and Waters Supplemental Memo: General: : The City is currently working on updating floodplain regulations in response to the FEMA BiOp. This includes considering greater ratios of compensatory excavation depending upon the location of development within the floodplain. In addition, the structure as well as fill that displaces flood water will require compensatory excavation.	Comment acknowledged. Discussions with the City are ongoing regarding mitigation for in-water impacts. Exact permitting requirements will be determined during the Final Design and permitting stage.	Rachel Barksdale

Comment ID	Topic	Comment By	Comment	Response	Response By
109501	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Sandra Burtzos	Parks and Rec Supplemental Memo: 1 and again on pgs 9-10: : Tree removal of large existing trees is a long-term impact, not a temp constr ph impact. It will take many decades for replacement trees to reach the same stature and canopy size as the existing trees. This impacts aesthetics as well as the environmental/habitat/stormwater retention benefits of the existing large trees.	The NEPA process generally discusses tree and other vegetation removal as a temporary impact, so this NEPA documentation follows that convention. It is acknowledged that tree replacement functions can take decades and that trees provide many functions. The various aspects of the tree benefits are discussed in the Parks and Recreation analysis and other reports including Visual Resources and Vegetation and Wildlife reports.	Jennifer Hughes
109502	NEPA Process	Bureau of Development Services (BDS), Morgan Steel	General: : : My biggest concern, as noted in my 11-2021 comments, remains avoiding, minimizing and mitigating impacts appropriately as we have been discussing in the mitigation meetings. As also discussed in those meetings, I need a more comprehensive picture tailored to City identified resources to determine what is sufficient. It sounds like the project team is working to put tother that information and we will continue our discussions tangentially to the formal EIS reviews.	Comment acknowledged. Mitigation discussions are ongoing and exact mitigation requirements will be determined during the permitting stage. The County commits to continuing this coordination with the City in advance of, as well as during, the Final Design phase.	Rachel Barksdale
109503	Parks and Recreation	Portland Parks and Recreation, Sandra Burtzos	Parks and Rec Supplemental Memo: 7: : Last bullet re use of WFP: Change term "trellis" to pavilion or structure. A trellis is an open airy garden structure to support plants.	This instance occurs in the technical memo not in the SDEIS. Changes to the technical reports 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 SDEIS 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.	Jennifer Hughes
109504	Comment noted	Eriks Zarins	Hello my name is Eriks Zarins. I'd like to lead off by saying when I first looked at the project website over 2 years ago I was impressed, a lot of information and was well presented so I think the people involved should be proud of their work. In March I completed a paper titled Portland's Future Burnside Bridge: Retaining Essential Features and I submitted PDFs to the County Chair, the Board and the project as well.	Comment acknowledged.	Sabrina Robinson
109507	Transportation - Long term bike, ped & ADA	Eriks Zarins	Three points out of that: 1) I think they should maintain all of the lanes they currently have. It may take more money but I beilieve it's such a vital link that the money would be found for it.	Comment acknowledged.	Adrian Witte
109508	Visual and Aesthetic Resources	Sam Zentner	Within the Revised Visual Resources Technical Report, analysis including: visual compatibility, viewer groups, visual quality presented a clear preferred alternative of the Refined Long-span Alternative with West Approach girder bridge, Mid bascule, and East Approach cable-stayed or tied-arch bridge. The visual compatibility, viewer groups analysis seemed to be the most solid in establishing aesthetic quantification, while the visual quality analysis seemed the most subjective though did build well on the two other analysis methods and addressed the overall visual impact of the bridge to the surrounding area. Further analysis differentiating cable-stayed or tied-arch designs will aid in design decision making.	Comment acknowledged.	Josh Carlson
109509		Eriks Zarins	2) THe bridge is a historic landmark so they should try to retain the control towers and incorporate those into the new bridge so that we have this connection to the past. And I'm sure they can design the new bridge to look similar to the old bridge, at tleat the parts that will be similar like the girder part and the bascule.	The Project Programmatic Agreement states the County "will explore options for salvage and reuse of existing features of the Burnside Bridge, including railings, mechanical components, and the operator towers."	David Ellis
109510	Parks and Recreation	Portland Parks and Recreation, Sandra Burtzos	Parks and Rec Supplemental Memo: 8, 14, 19: Pg 8 Table 2 Pg 14 Text Pg 19 7.1.4: Assuming that here (and in several of the supplemental memos), the pavilion is referred to as Ankeny Plaza Structure. Pavilion would be a more suitable term, but since Structure term is used in other memos, stick with that and remain consistent. Replace wherever the term trellis has been used, as that is not an appropriate term. Same as multiple previous comments still not addressed: This area of WFP where the pavilion is located is not called Ankeny Plaza officially by PPR. Ankeny Plaza is located on west side of Naito.	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
109511	Visual and Aesthetic Resources	Eriks Zarins	3) The eastern section, I think the cable supported one would visually work better with the parts that are already established than the tied arch design.	Comment acknowledged.	Josh Carlson
109512	Comment noted	Eriks Zarins	Lastly, a replacement option does exist, you can buy it at the Oregon museum store. It would reduce the budget substantially, hte only problem is it would reduce the lane widths [presents small paper bridge model].	Comment acknowledged.	Steve Drahota
109513	Visual and Aesthetic Resources	Lili F Ristagno	I really prefer the tied arch version aesthetically.	Comment acknowledged	Josh Carlson
109515	Transportation - Long term bike, ped & ADA	Joe Cullen	Bicycle transportation is crucial in combating climate change. Electric bicycles are reducing the barrier to entry for bicycle usage, making it even more important to prioritize bike lanes on the new Burnside Bridge. Do not incentize usage of fossil fuels. We must prioritize bike lanes and bicycle transportation infrastructure! Thank you, Joe Cullen	Comment acknowledged.	Adrian Witte
109516	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Sandra Burtzos	Parks and Rec Supplemental Memo: 16: Figure 12: Need to see a more detailed version showing proposed tree removals in order to fully understand the proposal. Suspect the updated plans for the mod PPR made to the circular stormwater facility just north of the bridge are still not being reflected, as our proj removed several young trees in the process that were planted when that facility was installed. The facility's function is now underground and the top surface is flat lawn. Need to preserve more of the trees. Removal of large oaks along Naito and cherries for the purpose of staging will need further discussions and careful planning to preserve as many as possible.	More detailed engineering and construction drawings will be available during the design process, though the FEIS includes updated tree impact details to reflect the arborist inventory completed as part of the project. The project will continue to discuss construction staging and impacts with PP&R through a Non-Park Use Permit.	Jennifer Hughes

Comment ID	Topic	Comment By	Comment	Response	Response By
109518	Comment noted	Eriks Zarins	Multnomah County Officials, I plan on attending the Wednesday, June 8, public meeting regarding a future Burnside Bridge. I will likely only get there around 5:30 pm. About how much time are we given to speak? Thank you.	N/A	Sabrina Robinson
109519	Active Transportation Access Options	Bob Wilcox	I recommend against building a bicycle and pedestrian ramp from a rebuilt Burnside Bridge to the Vera Katz Eastbank Esplanade. The Eastbank Esplanade has wheelchair grade ramps from the Steel Bridge and Tilikum Crossing. There are bike ramps to the Esplanade from the Hawthorne Bridge and the Morrison Bridge. I strongly object to an elevator. They are always breaking and being vandalized, PBOT has the data on the ones they manage.	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 Drahota
109521	Public Services	Portland Parks and Recreation, Maya Agarwal	All documents: GENERAL: N/A: More discussion will be required around the County's responsibility for security at all times throughout the project.	Discussions will continue during the Final Design phase regarding security once contractors are hired.	Sabrina Robinson
109522	Public Services	(PBOT) Portland Bureau of Transportation, Jason Grassman	RevisedActiveTransportationAccessOptionsMemorandum: 7: Table 1: During the 5 year bridge closure how will PFR Station #1 service the E. Burnside area?	Thank you for your comment. The Public Services Technical Report identifies that Public services that use the Burnside Bridge would need to redirect their cross-river response and service trips onto adjacent bridges during construction or use alternative facilities on either side of the bridge. PF&R response times when the Burnside Bridge is open or closed are generally the same, and, in the event of a bridge closure, PF&R would dispatch from an alternate location with better access to the destination. A pre-construction communication plan would be developed with all affected emergency response groups and other public service agencies detailing how detour and road closure information would be provided to the services.	Sabrina Robinson
109525	Transportation - Short term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Roger Geller	Attachment J: 7: line 59 and 61 in table: Mitigation should not be limited to either just the API or to "select neighborhood greenway streets immediately adjacent to the dedicated bicycle/pedestrain detour routes". Mitigation should be directed to any neighborhood greenway route where automotive traffic increases as a result of closure of the Burnside Bridge.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS public comment period and are in the errata chapters of this FEIS. For this comment, please see the mitigation section within the FEIS. The County has worked with PBOT to develop a list of mitigation measures including improvements for active transportation on designated detour routes as well as along routes expected to see traffic diversion from the bridge closure and traffic calming measures on neighborhood greenways that could be impacted by spillover traffic. The County commits to continuing this coordination with the City on this topic during the Final Design phase.	Adrian Witte
109527	Parks and Recreation	Portland Parks and Recreation, Jennifer Trimm	All documents: GENERAL: N/A: More discussion will be required to ensure that operations and maintenance activities, vehicles and equipment, and personnel can access PP&R properties safely (both for staff and for the public) at all times throughout the project.	The Project will continue to coordinate with PP&R maintenance staff regarding operations and maintenance access. Previous discussions included coordinating access for maintenance under the bridge in Waterfront Park approximately three times per day. The public will be excluded from the Boundary of Potential Construction Impacts via a detour for the Willamette Greenway Trail.	Jennifer Hughes
109528	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Jason Grassman	Revised Bridge Design Criteria Repor: 6 & 7: Figure 6: According to The River District Right-of-Way Standards 2.1.3 the transit lane width should be 12'.	Comment acknowledged. The transit design criteria referenced are not standards but are, "to guide and not to prescribe design solutions." The County commits to continuing coordination with the City and TriMet during the Final Design phase.	Lewis Kelley
109529	Transportation - Long term traffic, freight & transit	(PBOT) Portland Bureau of Transportation, Jason Grassman	Supplemental Draft Environmental Impact Statement - Executive Summary: S-10: Figure S-13: The bridge rails between the travel lane and the bike lane is shown as only 1' wide. The standard width of "F" rail is1'4" wide. https://www.oregon.gov/odot/engineering/202107/BR200.pdf.	Comment acknowledged. The County commits to continuing this coordination with the City on this topic during the Final Design phase.	Adrian Witte
109530	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Brandon Namm	Arborist report/ inventory: GENERAL: N/A: Trees 350-375 have not been inventoried due to project arborist's inability to access site. Provide additional information about trees, some of which were estimated at 20 inches dbh.	This level of detail is more appropriate for the permitting phase and will be analyzed during the Final Design and permitting phase. No edit made.	Rachel Barksdale
109531	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Brandon Namm	Vegetation, Wildlife, and aquatic species: 14: Table 7: Some of the unidentified trees north of the bridge (Trees 350-375) appear to be located in the Optional Construction Access area. Trees are not approved for removal.	The EIS is not claiming that the trees proposed for removal have been approved. Approval will be decided during the Final Design and permitting phase.	Rachel Barksdale
109532	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Brandon Namm	Vegetation, Wildlife, and aquatic species: 13 and 14: Tables 6 and 7: Show Tree ID numbers on every tree inventoried so it can be related back to the the tree inventory spreadsheet.	This level of detail is more appropriate for the permitting phase and will be addressed in the Final Design and permitting phase. No edit made.	Rachel Barksdale
109533	Cumulative Impacts	(PBOT) Portland Bureau of Transportation, Jason Grassman	RevisedActiveTransportationAccessOptionsMemorandum: 7: Table 1: Will need to coordinate with I5RQ project during construction.	Comment acknowledged. Coordination with the I-5 Rose Quarter Project, as well as many other projects, will occur as part of the future Final Design and Construction phases.	Steve Drahota
109534	Active Transportation Access Options	Y Harris	The ramp needs to be included as part of the final design. Project costs are not a valid excuse as to why compliance ADA is not feasible. Look at ODOT loosing their lawsuit and now having to retroactively fix ramps across the state at a higher cost then if done correctly the first time. This is in response to chapter 2.4.5 ADA, Bicycle, and Pedestrian Access to the Vera Katz Eastbank Esplanade and W 1st Avenue	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 Drahota

Comment ID	Topic	Comment By	Comment	Response	Response By
109535	Social and Neighborhood Resources	Portland Parks and Recreation, Dylan Paul	All documents: GENERAL: N/A: More discussion will be required around ensuring public access for public events. PP&R has attached a spreadsheet outlining a typical year's events at Waterfront Park.	Thank you for your comment. Ongoing discussions with PP&R will continue during final design.	Sabrina Robinson
109536	Section 4(f)	Portland Parks and Recreation, Dylan Paul	Draft Section 4(f) Analysis: GENERAL: M-1-36 through M-1-42: PP&R prefers to protect the Eastbank Esplanade floating sections in place. PP&R has concens about the large number of users that use the Eastbank Esplanade who will be detoured along the proposed pedestrian and bicycle detours. Closing the Eastbank Esplanade will result in significant impact fees. PP&R hopes that Eastbank Esplanade closures are minimal, intermittent, and brief.	Deconstruction of the existing bridge and construction of the replacement bridge will require moving the Eastbank Esplanade both to protect it from damage and to allow movement of construction barges from the east bank of the river to the center of the river during some portions of construction. The project will make all reasonable efforts to minimize the number and duration of closure events.	Jennifer Hughes
109537	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Brandon Namm	GENERAL: N/A: Include arborist report as a Supplemental Draft EIS Attachement describing how project will meet Portland Title 11 requirements. Also include the updated tree inventory with a column descirbing which trees are proposed for removal for each design scenario.	The arborist report is needed for permitting and will be deferred until the permitting phase. See Supplemental Draft EIS Errata Section 3.16 for updated tree inventory.	Rachel Barksdale
109538	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Brandon Namm	GENERAL: N/A: The EIS needs to incorporate recommendations from the project arborist into discriptions of existing conditions, justification why individual trees require removal, proposed tree protection, and project's impacts to retained trees.	This level of detail will be further analyzed in the Final Design and permitting phase. No edit made.	Rachel Barksdale
109539	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Brandon Namm	Chapter 3 Affected Environment and Environmental Consequences: Ch. 3, Pg 82: N/A: Include tree planting as part in mitigation section.	Thank you for your comment. Tree replacement will be included in the design phase.	Josh Carlson
109540	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Brandon Namm	Chapter 3 Affected Environment and Environmental Consequences: Ch. 3, Pg 103: N/A: Vegetation section: "...seven trees are proposed for removal would need to be removed with the Refine Long-span that would remain with the Draft EIS Long-span alternative." Explain which trees and why removal is necessary. Reference tree inventory and arborist report.	The trees proposed for removal are shown in Figures 3.16-2 and 3.16-3. Figures in the Supplemental Draft EIS Errata Section 3.16 have been revised to include updated arborist tree inventory.	Rachel Barksdale
109541	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Brandon Namm	Chapter 3 Affected Environment and Environmental Consequences: Ch. 3, Pg 104: Table 3.16-1: Table states 10 fewer trees would require removal with Refined Long-span. The vegetation section on Pg 103 describe seven trees that would need to be removed. This is confusing.	Addressed in Supplemental Draft EIS Errata Section 3.16.	Rachel Barksdale
109545	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Brandon Namm	Chapter 3 Affected Environment and Environmental Consequences: Ch. 3, Pg 105: Table 3.16-2: Provide tree inventory that was updated since Draft EIS was published showing which trees are not proposed for removal. Are the 6 additional tree removals in Tom McCall park (disribed in the caption) different from the additional 7 trees described on Pg 103?	Addressed in Supplemental Draft EIS Errata Section 3.16.	Rachel Barksdale
109546	Vegetation, Wildlife and Aquatic Resources	Portland Parks and Recreation, Brandon Namm	Chapter 3 Affected Environment and Environmental Consequences: Ch. 3, Pg 106: N/A: "The Refined Couch Extension would also displace about 10 percent more trees." Please describe which trees with ID numbers.	The Refined Couch Extension is not selected as the FEIS Preferred Alternative. Final analysis for tree impacts from the FEIS Preferred Alternative will be included in the Final Design and permitting phase.	Rachel Barksdale
109550	NEPA Process	Portland Parks and Recreation, Dylan Paul	All documents: GENERAL: N/A: Extensive discussions are required to better understand impacts and costs associated easements, permits of entry, and longterm O&M roles and responsibilities.	The level of analysis provided in the ROW Technical Report and NEPA documents is appropriate for this phase. As part of the Final Design phase, much more specificity for each ROW parcel and file will be established. This includes long-term Maintenance and Operations roles and responsibilities.	Steve Drahota
109551	Comment noted	Jordan Lewis	Do not add any auxiliary lanes to the IBR plan. Climate leaders don't widen freeways.	Comment acknowledged. The lead agency for this project is Multnomah County and is not related to the Interstate 5 Bridge Replacement.	Shane Phelps
109362	Floodplain and River Hydraulics	(PBOT) Portland Bureau of Transportation, Cameron Glasgow	Revised Bridge Design Criteria Report: Page 2: Section 1.3: Portland Harbor Wall should be included as critical infrastructure. The protection of a large portion of downtown from floodwaters depends on its functionality. It should also be addressed in Section 3.11 - Adjacent Facilities.	Comment acknowledged. Addressed within SDEIS Bridge Replacement Technical Report. Generally speaking, the Portland Harbor Wall, although critical infrastructure, is not part of the EQRB Project. The Harbor wall does not conflict with the proposed Earthquake Ready Burnside Bridge replacement. The current project approach is to protect the wall in place and construct the bridge replacement around the Harbor Wall so as not to damage or impact the facility. If during Final Design there is an impact, that will be addressed at that time.	Rebecca Bautista
109363	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Cameron Glasgow	Revised Bridge Design Criteria Report: Page 14: Section 3.11.2: It is concerning that the connecting bicycle and pedestrian structure on th east side will not be designed for seismic performance. The AASHTO LRFD Guide Specifications for the Design of Pedestrian Bridges are a supplement (not a replacement) for the AASHTO LRFD Bridge Design Specifications (AASHTO LRFD). The AASHTO LRFD would require seismic design.	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. Given that the existing facility will be protected, no change to the design is warranted.	Steve Drahota
109364	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Active Transportation Access Options: Page 4: 3rd Paragraph: Figure references need corrected.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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 SDEIS analysis. Upon review, the figure references are correct and no changes are needed.	Lewis Kelley

Comment ID	Topic	Comment By	Comment	Response	Response By
109365	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Active Transportation Access Options: Page 5-6: Notes: resize the figures so the notes associated with Figure 2 are not orphaned on page 6.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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 SDEIS analysis.	Lewis Kelley
109366	Vegetation, Wildlife and Aquatic Resources	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Active Transportation Access Options: Page 6: 4th bullet: revise wording. ….would remove slightly fewer trees and have fewer vegetation impacts…..	Changes to the technical reports 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 SDEIS public comment periods 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.	Shane Phelps
109367	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Active Transportation Access Options: Page 8: last paragraph: Consider rewording statements related to connections not being design to meet seismic design. The County has no intention of designing the facility and the City consultant is exploring concepts to be seismically resilient.	Comment acknowledged. The statement accurately portrays design work for the access options described.	Lewis Kelley
109368	Active Transportation Access Options	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Construction Approach: ES-2: 5th paragraph: Is the removal of the floating esplanade only needed for construction of the ped/bike ramp or is it needed for construction of the bridge? The last sentence of this paragraphi implies the former however the original DEIS docs included the removal as necessary for barge access for the bridge construction.	Comment acknowledged. A partial removal of the Eastbank Esplanade, for intermittent time periods, is needed for the replacement of the bridge. It is anticipated that the total duration of Eastbank Esplanade impacts summing the intermittent periods will not exceed 18 months. For a complete description of the potential construction impacts, please see the Constructability Technical Report that augmented the SDEIS.	Steve Drahota
109369	Transportation - Long term bike, ped & ADA	(PBOT) Portland Bureau of Transportation, Sharon Daleo	Executive Summary: S-12: sections: The west and east approach sections should be revised to provide 10' General Purpose lanes (keep 11' for the lane the bus travels in). The additional space should be allocated to the bike lane/buffer.	Comment acknowledged. Roadway configurations and lane widths were adjusted between the DEIS and SDEIS analysis. The referenced Figure S-8 shows the DEIS configurations. The SDEIS roadway configurations include lane width options between 10' and 11' with any additional available cross-section width being allocated to active transportation modes. The County commits to continuing the coordination with the City on this topic during the Final Design phase.	Lewis Kelley
109289	Air Quality	Andrew Holtz	The Supplemental Draft EIS fails to note the negative impacts to human health and the environment of the Refined Long-span Alternative relative to the proposed bridge design analyzed in the original Draft EIS. By substantially reducing the width and connectivity of the bicycle and pedestrian infrastructure, the Refined Long-span Alternative will not support and encourage increases in alternative transportation that would be anticipated with the earlier design. In particular, the SDEIS is wrong to state that “impacts from the Refined Long-span Alternative would be the same as described in the Draft EIS” with regard to mobile source air toxics. (3-120 | SECTION 3.19)	The roadway traffic analysis for the refined long-span alternative is the basis for the tailpipe emissions from vehicular traffic. This analysis indicated marginal differences between the refined long-span alternative relative to the design analyzed in the DEIS. From a total air pollutant emissions standpoint the two alternatives are very similar. No change made to SDEIS text.	Scott Noel
109290	Transportation - Long term bike, ped & ADA	Andrew Holtz	The SDEIS similarly fails to address the other effects of the substantial degradation in bicycle and pedestrian infrastructure because of cost-cutting. The SDEIS should include a thorough examination of differential effects on alternative transportation use between the original preferred alternative and the Refined Long-span Alternative.	Comment acknowledged. Changes to the technical reports written for the SDEIS were not revised as part of the FEIS. Where applicable, sections of the SDEIS chapters were revised based on comments received during the SDEIS 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 SDEIS analysis. The active transportation facilities across the bridge represented in the SDEIS documents provide an increase in available width and level of protected separation compared to the existing bridge. The County commits to continuing the coordination with the City on this topic during the Final Design phase.	Lewis Kelley
109291	Active Transportation Access Options	Kyle Kemenyes	In reference to keeping the existing stairs to save 2-3 years of work seems short sighted for a project where the intent is to build in resilience to earthquakes. Are the current stairs able to withstand an earthquake? How does this affect ADA compliance? What about cycling access to and from the Eastbank Esplanade? If this project is intended to be a 100 year lifetime, why nix accessibility when it's less than 1% of the total lifetime expected out of this bridge?	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. Because the stairway is a City asset, the Project team does not know the specific earthquake capacity of the stairway system.	Steve Drahota