Chapter 2

Draft EIS Errata

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U.S. Department of Transportation
Federal Highway Administration

Multnomah County

2 Draft EIS Errata

Table 2-1 provides an overview of revisions of the Draft EIS.[1] These edits reflect relatively minor updates and corrections that were identified based on agency and public comments. Each row of the table includes the section and page number of the Draft EIS where the original content is located, the revised content with edits indicated, and notes to explain the revision made. The text that has been deleted is shown with ~~red and strikethrough text~~, while text that has been added is shown with blue and underlined text. As needed, additional analysis to Draft EIS content is included in Chapter 4, Supplementary Analysis and Discussion.

Please note that Table 2-1 has not been optimized for screen readers. If you need assistance, please call 503-988-5970.

[1] The Draft EIS is available at the following location: https://www.multco.us/earthquake-ready-burnside-bridge/project-library

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Table 2-1. Draft EIS Narrative Errata

Draft EIS Location	Revised Content	Revision Notes
Section S.2 (page S-16)	If selected, a temporary bridge would be constructed to the south of the permanent bridge and tie into the permanent east and west approach spans. The temporary bridge would include a movable-lift section over the active navigation channel to accommodate river traffic up to 147 feet above the Ordinary High Water Mark of the Willamette River as required by the US Coast ~~Gaurd~~ Guard. See Figure S-12.	Revised to correct misspelling.
Section S.3 (page S-24)	*Historic Resources* There would be no adverse effects on ~~impact to~~ the two historic districts at the west end of the bridge nor the historic district near the east end. There will be a need to monitor construction vibration to ensure that it does not cause physical harm to nearby unreinforced masonry buildings. All of the replacement alternatives would remove the Burnside Bridge, and the Retrofit Alternative would cause substantial changes that would render it no longer eligible for the National Register of Historic Places. The Retrofit Alternative would also remove the Burnside Skatepark which has been recommended as eligible for the National Register; the other alternatives would only require a short-term closure for safety during construction. The Long-span Alternative would alter the view of the historic White Stag sign from some viewpoints but would not physically impact it.	Revised the statement about effects on historic resources.
Section 3.1.2 (page 3-11)	• Total ridership for all bus lines, including Lines 12, 19, and 20, crossing the Burnside Bridge would double by 2045.	Revised statement about bus lines crossing the bridge.
Section 3.1.2 (page 3-12)	Option 2 would provide in-kind stairs on the north side (like Option 1) with a new south-side ramp and stairway at the current site of the Saturday Market Administration building. Several layouts are being considered that have different switchback orientations and stair locations. The ramp would provide more direct access for eastbound bicyclists and southside pedestrians between the bridge and 1st Avenue, as well as provide a more direct connection to Better Naito and Waterfront Park.	Revised to identify an access benefit for this option that had not been stated previously.

Draft EIS Location	Revised Content	Revision Notes
Section 3.1.2 (page 3-13)	Option 4 would provide in-kind stairs on the north side with a new south-side ramp and stairs at the current site of the Mercy Corps parking lot. Layout variations include tradeoffs between the ramp grade, the ability to include stairs, and the location of the touchdown which would affect whether or not there would be temporary traffic impacts on Naito Parkway during construction. As with Option 2, this option would improve pedestrian and bicycle access between 1st Avenue and the bridge for eastbound travelers, as well as provide a more direct connection to Better Naito and Waterfront Park.	Revised to identify an access benefit for this option that had not been stated previously.
Section 3.1.2 (page 3-13)	Option 5 is the same as Option 4 but adds ~~f~~ a mid-block crossing on the bridge, with the same impacts and benefits as described for the mid-block crossing in Option 3.	Revised to remove a typographical error.
Section 3.1.2 (page 3-17)	Priority use of the bridge would be for evacuation and other emergency services and recovery efforts. It is anticipated that the bridge traffic after initial debris clearing would first consist of emergency responders engaging in rescue and debris clearing operations, followed by vehicles, as well as bicycles used for emergency response, hauling emergency supplies such as water, food, fuel, and materials/equipment and personnel needed to make emergency repairs on critical utilities and facilities. Private cars would likely have difficulty reaching the bridge due to ground transportation damage such as fallen debris, damaged utilities, roadway, and bridge/overpass damage.	Revised to include bicycles in emergency response.

Draft EIS Location	Revised Content	Revision Notes
Section 3.1.3 (page 3-19)	**Table 3.1-6. Travel Times with No Temporary Bridge – Westbound AM Peak Hour**	Revised font for some entries from regular to bold and added a note to the table.

Route	Route Title	Travel Time Existing (minutes)	Travel Time No Temp Bridge (minutes)	Travel Time Difference (minutes)
Multnomah/21st to Burnside/Broadway	Broadway Bridge	11.0	15.5	+4.5
Multnomah/21st to Burnside/Broadway	**Steel Bridge**	**11.0**	**14.0**	**+3.0**
Multnomah/21st to Burnside/Broadway	Burnside Bridge	9.0	(Burnside Bridge closed)	Not Applicable
Sandy/22nd to Burnside/Broadway	**Steel Bridge**	**12.0**	**15.0**	**+3.0**
Sandy/22nd to Burnside/Broadway	Burnside Bridge	8.5	(Burnside Bridge closed)	Not Applicable
Sandy/22nd to Burnside/Broadway	Morrison Bridge	11.5	20.5	+9.0
Burnside/20th to Burnside/Broadway	Broadway Bridge	15.0	20.5	+5.5
Burnside/20th to Burnside/Broadway	**Steel Bridge**	**13.0**	**16.0**	**+3.0**
Burnside/20th to Burnside/Broadway	Burnside Bridge	9.0	(Burnside Bridge closed)	Not Applicable
Burnside/20th to Burnside/Broadway	Morrison Bridge	13.0	22.0	+9.0
Stark/20th to Burnside/Broadway	Burnside Bridge	10.0	(Burnside Bridge closed)	Not Applicable
Stark/20th to Burnside/Broadway	**Morrison Bridge**	**12.0**	**21.0**	**+9.0**

Note: **Bolded** rows indicate the optimal modeled route for each origin and destination pair.

Draft EIS Location	Revised Content	Revision Notes
Section 3.1.3 (page 3-20)	**Table 3.1-7. Travel Times with No Temporary Bridge – Eastbound PM Peak Hour**	Revised font for some entries from regular to bold and added a note to the table.

Route	Route Title	Travel Time Existing (minutes)	Travel Time No Temp Bridge (minutes)	Travel Time Difference (minutes)
Burnside/Broadway to Multnomah/21st	Broadway Bridge	19.0	25.0	+6.0
Burnside/Broadway to Multnomah/21st	**Steel Bridge**	**16.5**	**22.0**	**+5.5**
Burnside/Broadway to Multnomah/21st	Burnside Bridge	16.5	(Burnside Bridge closed)	Not Applicable
Burnside/Broadway to Multnomah/21st	Morrison Bridge	21.5	32.0	+10.5
Burnside/Broadway to Sandy/22nd	**Steel Bridge**	**19.0**	**24.5**	**+5.5**
Burnside/Broadway to Sandy/22nd	Burnside Bridge	16.0	(Burnside Bridge closed)	Not Applicable
Burnside/Broadway to Sandy/22nd	Morrison Bridge	19.0	25.5	+6.5
Burnside/Broadway to Burnside/20th	**Steel Bridge**	**18.0**	**23.5**	**+5.5**
Burnside/Broadway to Burnside/20th	Burnside Bridge	13.0	(Burnside Bridge closed)	Not Applicable
Burnside/Broadway to Burnside/20th	Morrison Bridge	16.5	23.5	+7.0
Burnside/Broadway to Stark/20th	Burnside Bridge	16.0	(Burnside Bridge closed)	Not Applicable
Burnside/Broadway to Stark/20th	**Morrison Bridge**	**14.0**	**22.0**	**+8.0**

Note: **Bolded** rows indicate the optimal modeled route for each origin and destination pair.

Draft EIS Location	Revised Content	Revision Notes
Section 3.1.3 (page 3-31)	**Table 3.1-11. All Modes Temporary Bridge Travel Times – Westbound AM Peak Hour**	Revised font for some entries from regular to bold and added a note to the table.

Route	Route Title	Existing (minutes)	All Modes Temporary Bridge (minutes)	Difference (minutes)
Multnomah/21st to Burnside/Broadway	Broadway Bridge	11.0	13.0	+2.0
Multnomah/21st to Burnside/Broadway	**Steel Bridge**	**11.0**	**12.0**	**+1.0**
Multnomah/21st to Burnside/Broadway	Burnside Bridge	9.0	14.5	+5.5
Sandy/22nd to Burnside/Broadway	**Steel Bridge**	**12.0**	**13.0**	**+1.0**
Sandy/22nd to Burnside/Broadway	Burnside Bridge	8.5	15.0	+6.5
Sandy/22nd to Burnside/Broadway	Morrison Bridge	11.5	19.0	+7.5
Burnside/20th to Burnside/Broadway	Broadway Bridge	15.0	18.0	+3.0
Burnside/20th to Burnside/Broadway	**Steel Bridge**	**13.0**	**14.5**	**+1.5**
Burnside/20th to Burnside/Broadway	Burnside Bridge	9.0	15.0	+6.0
Burnside/20th to Burnside/Broadway	Morrison Bridge	13.0	20.0	+7.0
Stark/20th to Burnside/Broadway	**Burnside Bridge**	**10.0**	**15.0**	**+5.0**
Stark/20th to Burnside/Broadway	Morrison Bridge	12.0	19.0	+7.0

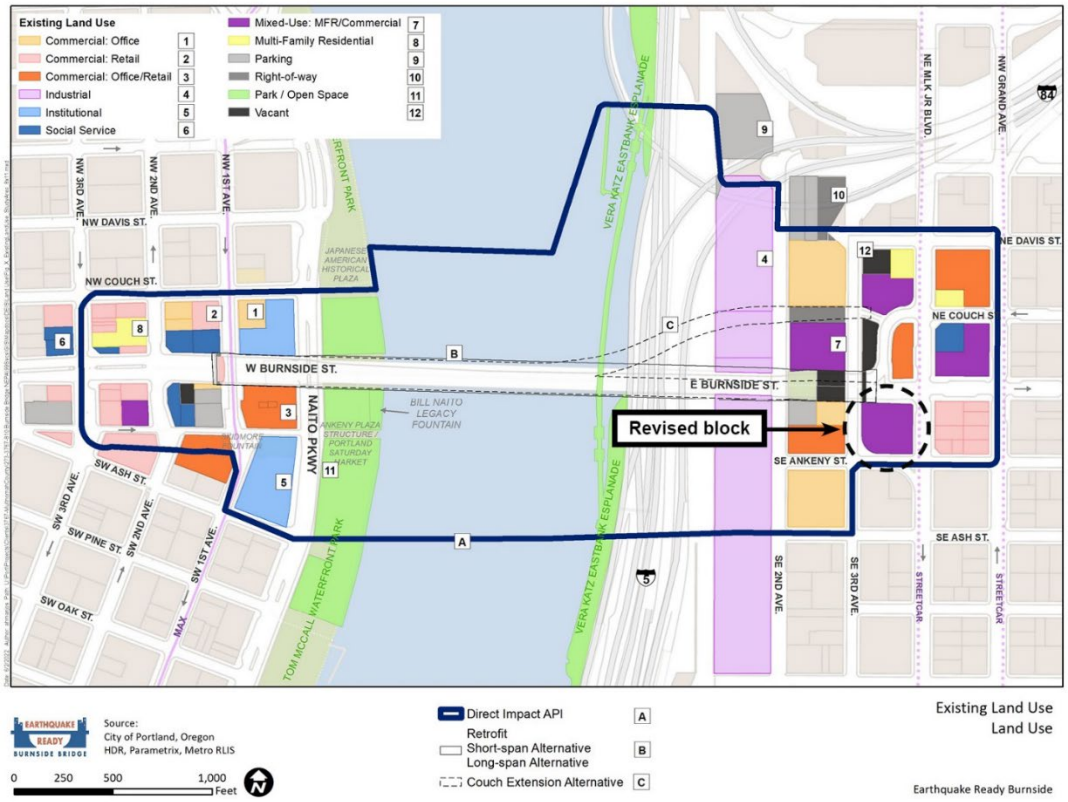
Notes: In this table, all references to the Burnside Bridge are the potential temporary bridge.
Bolded rows indicate the optimal modeled route for each origin and destination pair.

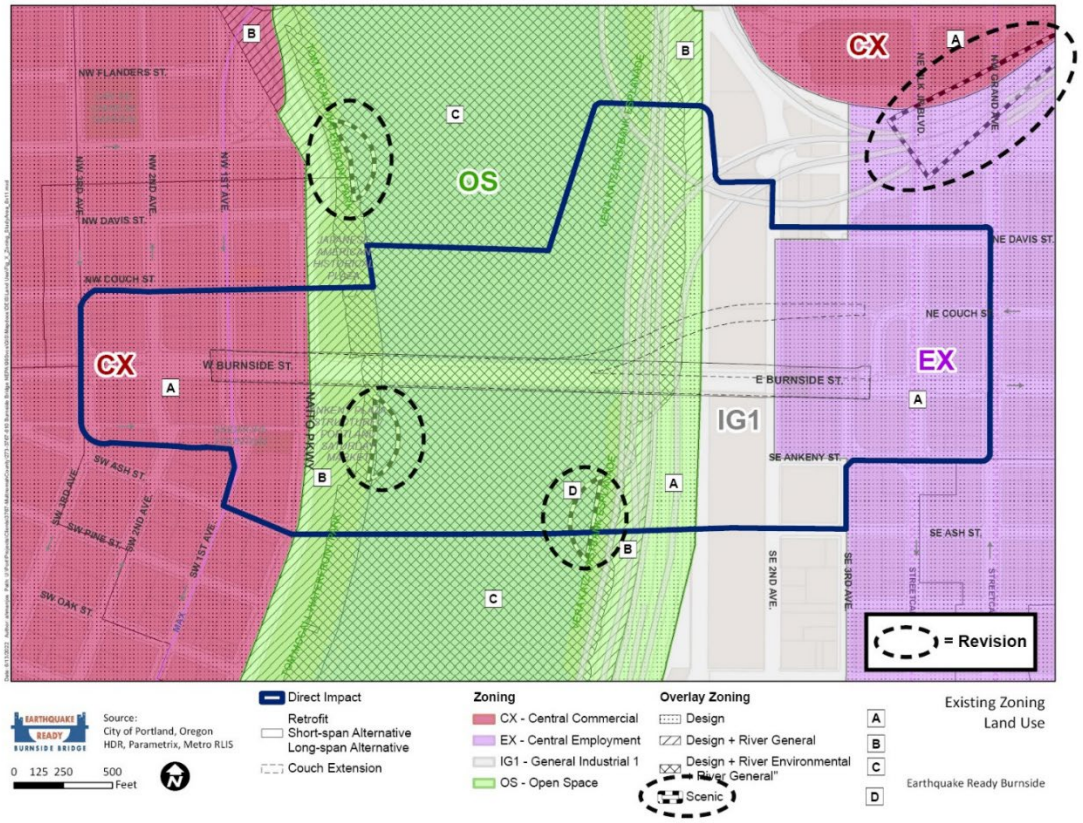
Draft EIS Location	Revised Content	Revision Notes
Section 3.1.3 (page 3-32)	**Table 3.1-12. All Modes Temporary Bridge Travel Times – Eastbound PM Peak Hour**	Revised font for some entries from regular to bold and added a note to the table.

Route	Route Title	Existing (minutes)	All Modes Temp Bridge (minutes)	Difference (minutes)
Burnside/Broadway to Multnomah/21st	Broadway Bridge	19.0	23.5	+4.5
Burnside/Broadway to Multnomah/21st	**Steel Bridge**	**16.5**	**18.5**	**+2.0**
Burnside/Broadway to Multnomah/21st	Burnside Bridge	16.5	19.0	+2.5
Burnside/Broadway to Multnomah/21st	Morrison Bridge	21.5	29.0	+7.5
Burnside/Broadway to Sandy/22nd	Steel Bridge	19.0	21.5	+2.5
Burnside/Broadway to Sandy/22nd	**Burnside Bridge**	**16.0**	**18.0**	**+2.0**
Burnside/Broadway to Sandy/22nd	Morrison Bridge	19.0	23.0	+4.0
Burnside/Broadway to Burnside/20th	Steel Bridge	18.0	21.0	+3.0
Burnside/Broadway to Burnside/20th	**Burnside Bridge**	**13.0**	**15.5**	**+2.5**
Burnside/Broadway to Burnside/20th	Morrison Bridge	16.5	20.5	+4.0
Burnside/Broadway to Stark/20th	**Burnside Bridge**	**16.0**	**18.5**	**+2.5**
Burnside/Broadway to Stark/20th	Morrison Bridge	14.0	18.5	+4.5

Notes: In this table, all references to the Burnside Bridge are the potential temporary bridge.
Bolded rows indicate the optimal modeled detour route for each origin and destination pair.

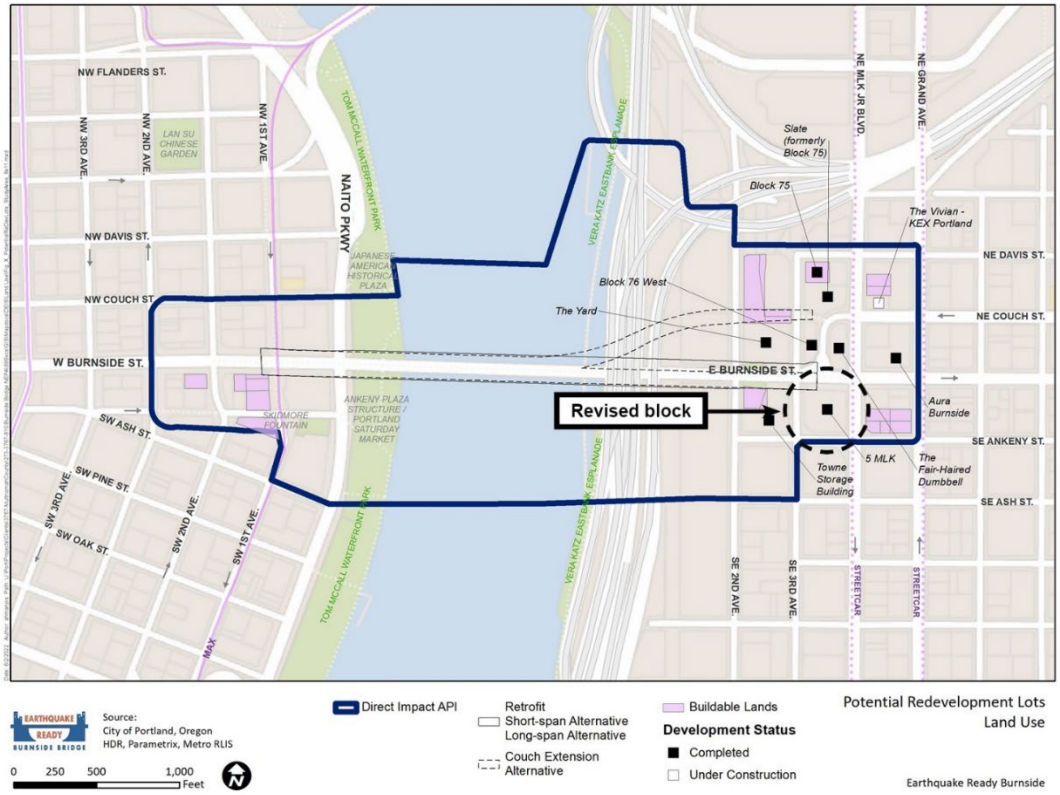
Draft EIS Location	Revised Content	Revision Notes
Section 3.1.6 (page 3-36)	• As the Project proceeds into final design, consider updating traffic signals within the Safety Direct API to include reflective backplates, protected only ~~left~~ turn phasing where ~~left~~ turn lanes already exist, pedestrian lead intervals and bike approach warnings where warranted, and right turn and left turn traffic calming to reduce motor vehicle turning speeds and increase driver visibility of pedestrians and bicyclists.	Revised to include opportunities for protected phasing on both left and right turns.
Section 3.1.6 (page 3-38)	• A transit management plan that considers tools such as transit priority, dedicated travel lanes, or other bus route and streetcar mitigation measures would be developed by the project team in cooperation with TriMet, PBOT, Metro, and the other project teams to develop detour routes and inform final mitigation decisions.	Revised to include Metro.
Section 3.4.1 (page 3-55)	Zoning on the west end of the Burnside Bridge within the API includes Central Commercial with a design overlay zone, the Central City Plan District, and Skidmore/Old Town Historic District (see Figure 3.4-2). Around the east end of the bridge, zoning consists of General Industrial 1 and Central Employment with a design overlay zone, within the Central City Plan District. The center of the Willamette River extending west landward to SW Naito Parkway is zoned Open Space with design, river environmental, scenic,[1] and river recreational overlays. The eastern side of the Willamette River is zoned Open Space with river general overlay, river environmental, design, and a scenic ~~resource~~ overlay ~~extending from the center of the bridge northeast~~. Open Space comprises the land directly east of the river to the railroad tracks. [1] Land use requirements for river environmental and scenic overlays are addressed in the EQRB Parks and Recreation (Multnomah County 2021r) and EQRB Visual Resources (2021cc) technical reports.	Added reference to other Draft EIS documents that refer to (e) and (s) overlays.

Draft EIS Location	Revised Content	Revision Notes
Section 3.4.1 (page 3-56)		Revised the status of the block southeast of the intersection at Burnside and SE 3rd from Vacant to Mixed-Use: MFR/Commercial.

Draft EIS Location	Revised Content	Revision Notes
Section 3.4.1 (page 3-57)		Revised to include Scenic Overlay Zoning.

Draft EIS Location	Revised Content	Revision Notes
Section 3.4.1 (page 3-58)	Applicable regional and local land use plans include the City of Portland *2035 Comprehensive Plan*, *Central City 2035 Plan* ~~(when re-adopted)~~as re-adopted in 2020, the Metro *2040 Growth Concept*, and Metro *2018 Regional Transportation Plan* and *Regional Framework Plan*. The City of Portland *2035 Comprehensive Plan* provides long-range planning and retains Commercial, Industrial, Central Employment, and Open Space as the primary designations for the area. The *Central City 2035 Plan*~~2~~ addresses planning within the Central City area and recommends classifying the Burnside Bridge as a major emergency response route, major transit priority street, major city bikeway, and city walkway. New policies and implementing tools were adopted to better protect and conserve the Willamette River and its riparian areas. Additionally, viewpoints and views were identified including views of and from the Burnside Bridge, and height regulations were updated to prevent intrusion into protected view corridors. The Metro *2040 Growth Concept* shows W/E Burnside Street designated as a Main Street and the existing high-capacity transit running through the API on the west side of the river. The Metro *2018 Regional Transportation Plan* identifies the importance of the regional transportation system including bridges crossing the Willamette River to support an interconnected system and planned land uses. Metro's *Regional Framework Plan* unites all of Metro's adopted land use planning policies with an objective to focus growth and transportation investment in designated 2040 growth areas, which includes Portland's Central City area. ~~2 The Oregon Court of Appeals remanded the Central City 2035 Plan on March 16, 2020. The City plans to address the necessary changes related to allowed heights in the New Chinatown/Japantown Historic District and readopt the Central City 2035 Plan.~~	Revised information about the Central City 2035 Plan.

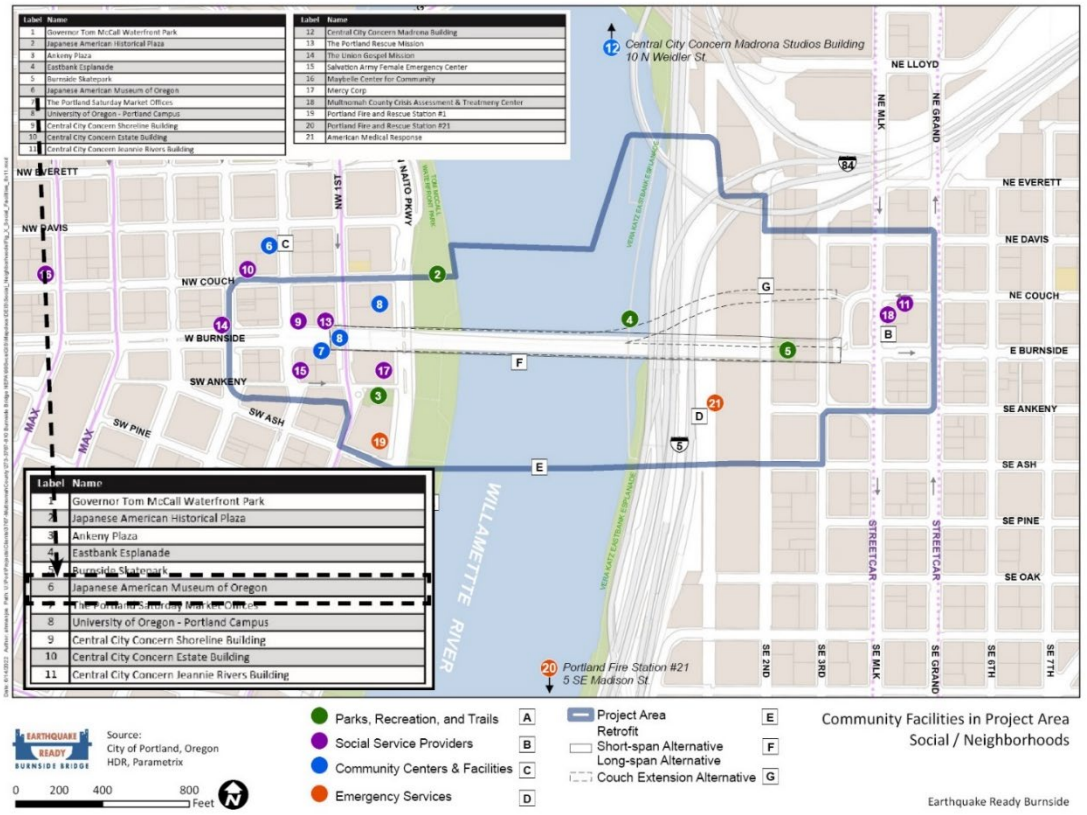
Draft EIS Location	Revised Content	Revision Notes
Section 3.4.2 (page 3-58)	**Direct** – All of the build alternatives would require property acquisitions/displacements and easements (please refer to Table 3.3-1). No residential displacements would be required. The build alternatives are consistent with the *Central City 2035 Plan* and Metro's *2040 Growth Concept* for the following reasons*:* • The build alternatives support the goals of designating Burnside as a major emergency response route and supporting bicycle and pedestrian connections. • The build alternatives would provide redevelopment opportunities on affected lots that would allow for development consistent with existing plans. • The build alternatives would not change travel patterns or traffic volumes and so would not induce land use changes that might be inconsistent with existing plans. Additionally, the build alternatives are consistent with Oregon Statewide Goal 5 by maintaining open spaces within Tom McCall Waterfront Park and the Vera Katz Eastbank Esplanade. They are also consistent with Statewide Goal 7 by planning for Oregon's natural hazards, such as the Cascadia Subduction Zone earthquake. All build alternatives would need to comply with Title 33 Zoning codes and development standards. A Type II or Type III land use review and a Type IV Demolition Review procedure would be required.	Added text regarding Goal 7.
Section 3.4.2 (page 3-61)	Impacts from Bicycle/Pedestrian/ADA Access Options Multiple options are being considered for providing direct bicycle, pedestrian, and ADA access between the west end of the Burnside Bridge and 1st Avenue which crosses under the bridge (see the figures in Attachment G of this Draft EIS and detailed descriptions of the options and impacts in the *EQRB Active Transportation Access Options Memorandum* [Multnomah County 2021]). The areas that would be affected under any of the options are all within the Skidmore/Old Town Historic District, the Central City 2035 Plan area, and are designated with the Central Commercial~~Employment~~ base zone, Comprehensive Plan designation, and a Design overlay zone. Impacts generally consider whether the proposed use is consistent with the applicable designations and plans and whether the options are differentiated from the bridge alternatives in the Draft EIS based on these factors.	Revised to correct zoning designation.

Draft EIS Location	Revised Content	Revision Notes
Section 3.4.4 (page 3-64)		Revised the status of 5 MLK southeast of the intersection at Burnside and SE 3rd from Under Construction to Completed.

<table>
<tr><th>Draft EIS Location</th><th>Revised Content</th><th>Revision Notes</th></tr>
<tr><td>Section 3.5.2
(page 3-67)</td><td>The build alternatives are also expected to improve traffic safety in the project area. Specifically, due to changes in the geometry of the bridge roadway, the replacement alternatives would improve safety for automobile, bicycle, and pedestrian traffic on the bridge and bridge approaches. This would lead to a reduction in crashes (including ~~accidents~~ crashes with fatalities and serious injuries), and a reduction in the socioeconomic costs associated with crashes (see Table 3.5-1). The Retrofit Alternative would improve safety only on the west approach.

Table 3.5-1. Comparison of Safety Economic Impacts from Build Alternatives
<table><tr><th>Alternative</th><th>Safety Impacts</th><th>Monetary Value (Over 20 Years)</th></tr><tr><td>Enhanced Retrofit</td><td>Improvements to geometry at west approach and intersections would improve safety for motor vehicles, bicyclists, and pedestrians.</td><td>$0.47 million in avoided crash costs~~accidents~~</td></tr><tr><td>Replacement, Short-Span and Long-Span Approach</td><td>Greater safety impacts compared to Retrofit. These alternatives would change road geometry of the mid-span and the east approach, improving safety at the locations of past serious ~~accidents~~crashes.</td><td>$61 million in avoided crash costs~~accidents~~</td></tr><tr><td>Replacement with Couch Extension</td><td>Somewhat lower reduction in the number of ~~accidents~~ crashes compared to the Short-span and Long-span Alternatives.</td><td>$60 million reduction in ~~accident~~ crash costs</td></tr></table></td><td>Replaced the word “accident” with “crash” to align with the terminology used by the City of Portland’s and Metro’s Vision Zero plans and policies.</td></tr>
</table>

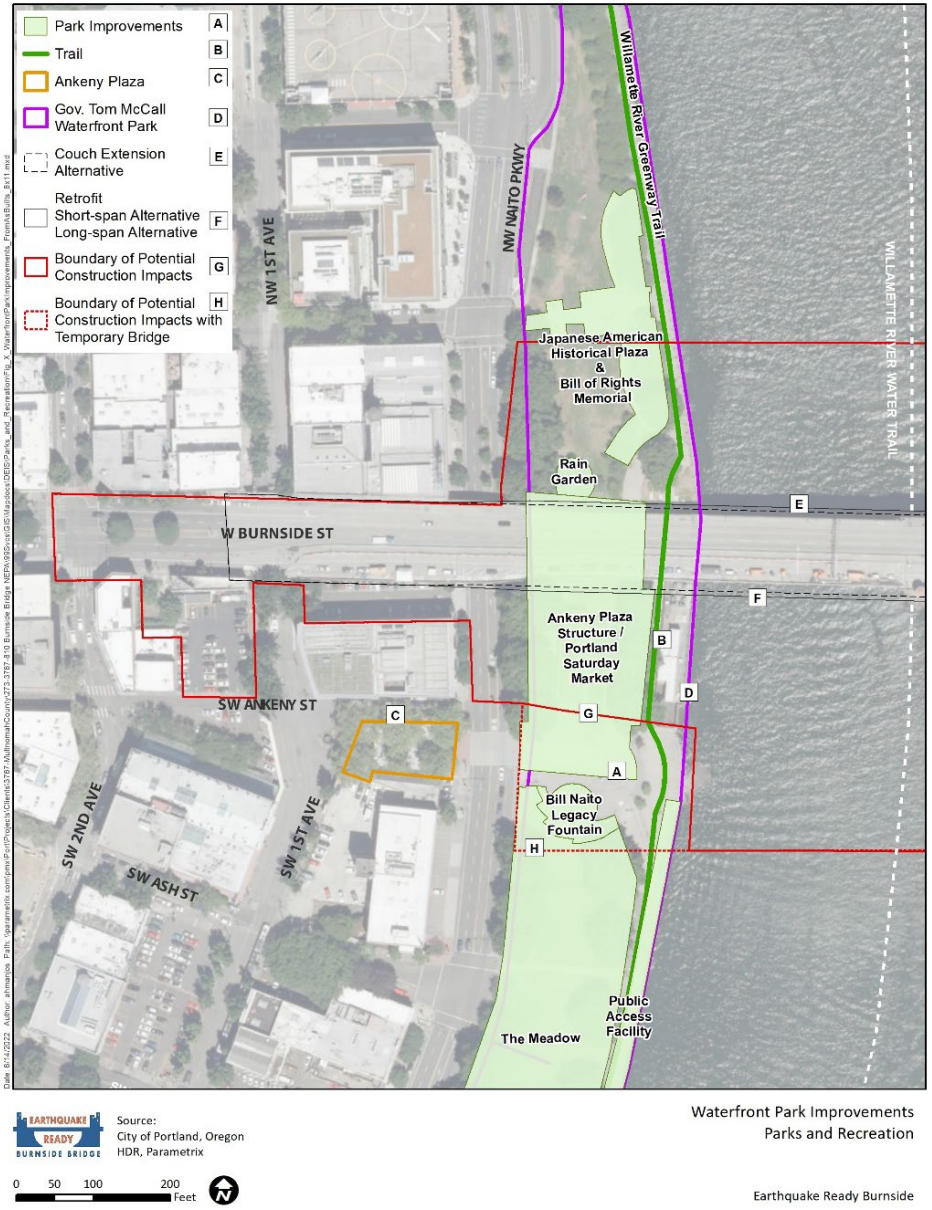
Draft EIS Location	Revised Content	Revision Notes
Section 3.5.3 (page 3-68)	• Closure or relocation of PSM from its current location during construction. If PSM cannot be relocated, temporary closure would mean a loss of income for the participating vendors (estimated at over $8 million annually to over 300 members),[1] loss of revenue to Portland Parks and Recreation (PP&R), and temporary loss of a city landmark and tourist attraction. [1] Portland Saturday Market website, https://www.portlandsaturdaymarket.com/about/history/ (accessed December 2019). The term *Portland Saturday Market* applies to all vendor activities around the bridge that may be commonly identified as such. This includes the Ankeny Markets adjacent to the Portland Saturday Market. These markets will also have to relocate during construction and may be affected in a similar way.	Revised the footnote to acknowledge comment regarding the activities of Ankeny Market adjacent to the Portland Saturday Market.
Section 3.8.1 (page 3-91)	Social/neighborhood resources in the API that provide opportunities for community gatherings and social interaction include Governor Tom McCall Waterfront Park (Waterfront Park), the Japanese American Historical Plaza, Ankeny Plaza, the Vera Katz Eastbank Esplanade (Eastbank Esplanade; includes the Kevin J. Duckworth Memorial Dock), the Burnside Skatepark, the Japanese American Museum of Oregon, Portland Saturday Market (PSM), the University of Oregon Portland, Portland Rescue Mission (PRM), Central City Concern (CCC), the Salvation Army, Because People Matter (Night Strike), Mercy Corps, and the Burnside Bridge itself as a gathering space (see Figure 3.8-2). Emergency services are discussed in Section 3.6, Public Services.	Revised to include the Burnside Bridge.

Draft EIS Location	Revised Content	Revision Notes
Section 3.8.1 (page 3-94)		Revised item 6 in the key from The Oregon Nikkei Legacy Center to Japanese American Museum of Oregon.

Draft EIS Location	Revised Content	Revision Notes
Section 3.8.1 (page 3-95)	**Mercy Corps** – The international headquarters is located immediately south of the west approach at 45 SW Ankeny Street. While they do not generally provide daily social services at this location, the building is used to coordinate humanitarian responses to international disasters and crises such as food or water crises. Additionally, Mercy Corps Northwest ~~provides assistance to~~assists low-income citizens in Oregon and Washington by providing resources and support to help increase economic self-sufficiency and community integration. **Burnside Bridge** – The design and location of the Burnside Bridge, accessibility to pedestrians, and lack of direct freeway connections have made the bridge an optimal location for public gathering events whether organized, such as the Rose Festival parade, or ad hoc, such as the Black Lives Matter and other civic demonstration marches. This function of the bridge contributes to its cultural and social importance.	Added a paragraph about the Burnside Bridge.
Section 3.8.1 (page 3-100)	• Less frequent and extensive long-term maintenance would have fewer noise and access effects on the community resources in the API compared with the Retrofit Alternative. Similarly, this alternative would provide an even greater reduction in the potential risk of seismic damage compared to the Retrofit Alternative. • The Burnside Bridge would be entirely replaced with a new bridge, losing the connection to historic past cultural use of the bridge as a gathering space.	Added a statement about the Burnside Bridge.
Section 3.10.1 (page 3-121)	There ~~is~~ was an indication that some recreational lands partially in the API could be subject to Section 6(f) of the Land and Water Conservation Fund (LWCF) Act; however, LWCF funds were not applied within the API. Coordination with the Oregon Parks and Recreation Department (OPRD) LWCF program, the National Park Service (NPS), and the City of Portland ~~is ongoing to identify the extent of the site purchased and/or developed using LWCF monies and could result in recommendations for mitigation that could be applied to reduce, avoid, or offset impacts~~occured to identify the extent of use of LWCF monies. The official boundary determination of LWCF grant monies ~~that could apply to the project has not yet been received from~~ was received from NPS in February 2022 indicating ~~, however OPRD has preliminarily indicated~~ that LWCF Section 6(f) will not apply. ~~The Final EIS will include Section 6(f) analysis and compliance information.~~	Revised the statement about LWCF Section 6(f) boundary determination.

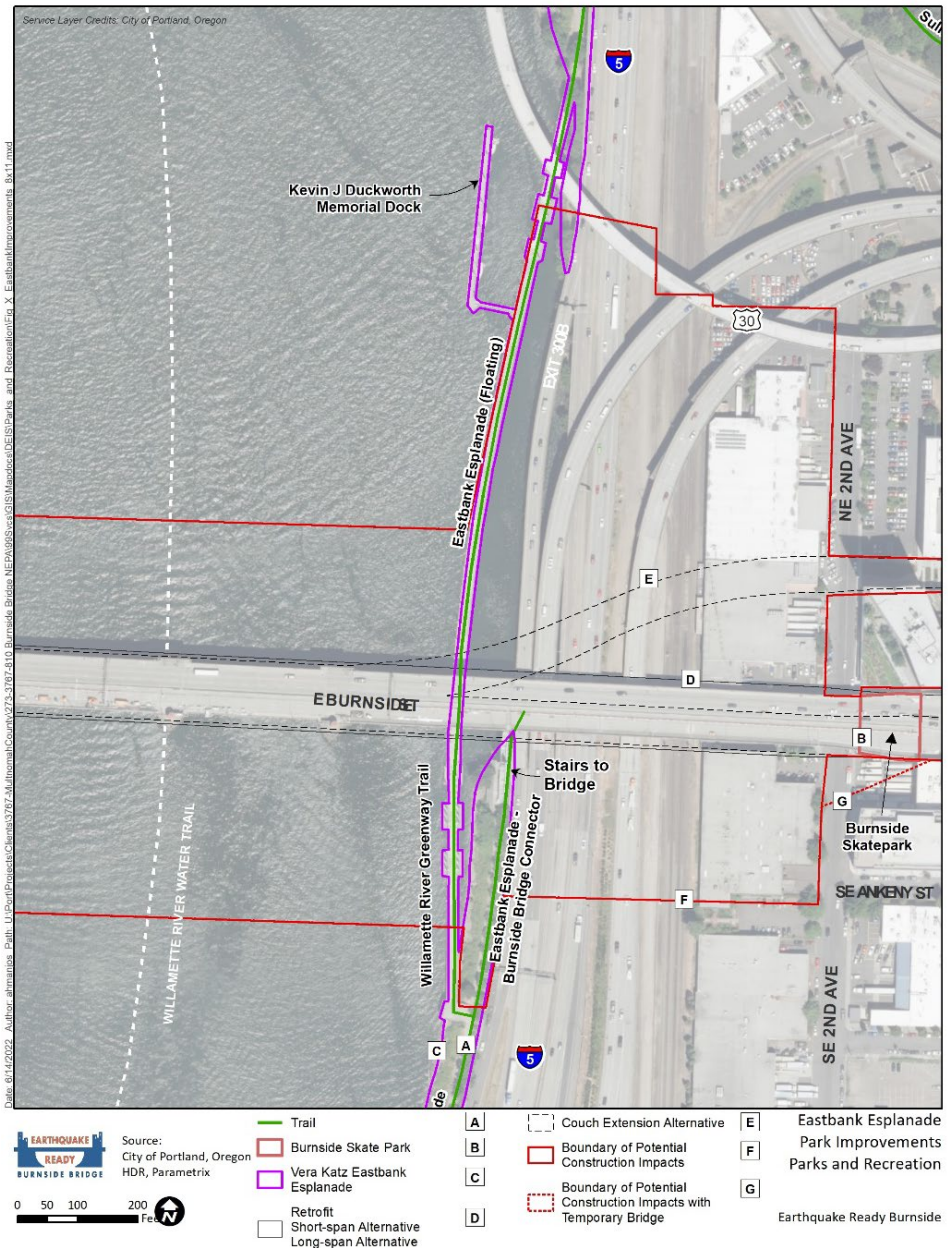
Draft EIS Location	Revised Content	Revision Notes
Section 3.10.1 (page 3-123)	**Governor Tom McCall Waterfront Park** – Owned and managed by the City of Portland, this 36-acre park is located between the Willamette River and downtown Portland. It was constructed between 1974 and 1978. Features in the API include the Willamette River Greenway Trail; the Japanese American Historical Plaza; Ankeny Plaza Structure/Portland Saturday Market Location (the structure is also known as the Waterfront Park Pavilion); and The Meadow and Bill Naito Legacy Fountain.	Added reference to the Waterfront Park Pavilion in response to a comment about the name Ankeny Plaza Structure.
Section 3.10.2 (page 3-127)	Portland Saturday Market (PSM) would need to operate at another location for the duration of construction. Portland Parks and Recreation's (PP&R's) lease agreement with PSM would need to be adjusted. If the PSM relocation is not within PP&R's properties, it would have an impact on PP&R revenues. Per discussions with PP&R and PSM, the preferred temporary relocation during construction would be on the grass immediately south of the Waterfront Park Pavilion's hardscape area. This could include replacing the grass with pavers that could easily be removed when construction is completed. A decision about this relocation would be made within the first year of the Final Design phase, and would involve Multnomah County, PP&R, and PSM. For the duration of construction, the many events normally held in Waterfront Park could not occur within the Boundary of Potential Construction Impacts area. Events normally held in the Japanese American Historical Plaza could still use the unimpacted north half of the plaza; however, because these events are typically memorials, vigils, and remembrance days, their reflective, quiet nature would likely be disturbed by intense construction on the bridge unless they occurred on weekends when no major construction is anticipated ~~to occur~~. Running and walking events that normally use the Willamette River Greenway Trail could continue to occur but would need to use the detour routes. The many events held in The Meadow and farther south in Waterfront Park ~~could~~ may or may not be able to continue, ~~but~~ and they would be restricted from park access within the Boundary of Potential Construction Impacts.	Added further description of PSM mitigation, including potential sites, the timeline for determining if relocation is possible, and who is providing input on this decision. Revised to avoid ambiguity associated with the word *could*.

Draft EIS Location	Revised Content	Revision Notes
Section 3.10.2 (page 3-127)	*Vera Katz Eastbank Esplanade* – The Boundary of Potential Construction Impacts for all the build alternatives encompasses approximately 80 percent of the length of the floating portion of the Eastbank Esplanade, not including the Kevin J. Duckworth Dock (Figure 3.10-4). Because construction barges would need to access both sides of the Esplanade and extensive work would occur directly above and below the Esplanade, it would be impractical and unsafe to allow users access during construction. Intermittently during construction, portions of the floating structure would be disconnected and moved out of the way to allow barge movement and other construction activities, however the Duckworth Dock would remain in place and accessible. The amount of construction time would vary with each alternative. During these closures, bicycle and pedestrian trail users would need to use the proposed detour routes shown in Figure 3.1-8 and Figure 3.1-9 in Section 3.1, Transportation. Depending on the detour route taken, the added time would be 5 to 12 minutes for bicyclists and 10 to 15 minutes for pedestrians. Detour routes were identified as those which were the most reasonable routes and which would be easy to indicate with signage. In practice, some bicyclists and pedestrians are also anticipated to identify their own detour routes to meet their particular needs.	Revised construction impact to Kevin J. Duckworth Dock.

Draft EIS Location	Revised Content	Revision Notes
Section 3.10.2 (page 3-128)		Added the Boundary of Potential Construction Impacts and the Boundary of Potential Construction Impacts with Temporary Bridge indicators; removed Direct API indicators.

Section 3.10.2

(page 3-129)



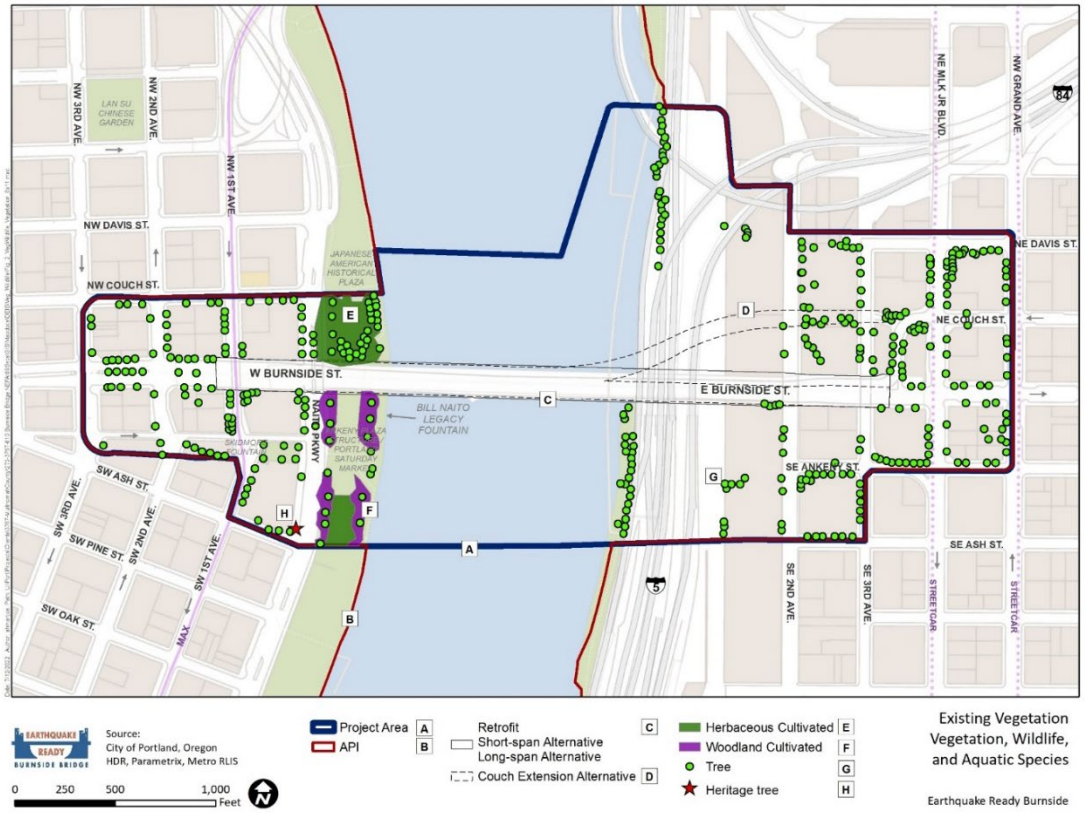
Added the Boundary of Potential Construction Impacts and the Boundary of Potential Construction Impacts with Temporary Bridge indicators; removed Direct API indicators.

Draft EIS Location	Revised Content	Revision Notes
Section 3.11.1 (page 3-137)	Four locations were identified as potential archaeological sites based on the current field conditions (i.e., relatively undeveloped land and not occupied by buildings or paved surfaces), a review of historic maps and other imagery, and associated landforms. Tribal consultation was initiated during the scoping process and continues. Tribes have been provided with copies of the draft technical report and Draft EIS for review and comment. All four locations are considered to have a moderate to high potential for historic-period archaeological resources. The potential for precontact archaeological resources is considered moderate in the first two locations, but is considered low in other locations given the extensive and intensive historic and modern disturbance that has occurred.	Added a statement regarding potential for historic-period archaeological resources.
Section 3.11.1 (page 3-140)	In consultation with SHPO, the baseline survey conducted in the API was considered sufficient to address project effects for the entire APE (Figure 3.11-3). A total of 50 historic resources were identified: 41 buildings, 4 sites, 3 structures, and 2 objects. Of these resources, 23 buildings and 1 object are currently listed as contributing resources in the Skidmore/Old Town NHL District; 4 buildings and 1 structure are individually listed on the National Register of Historic Places (NRHP); 9 buildings, 1 structure, 3 sites, and 1 object within the Skidmore/Old Town NHL District boundaries are non-contributing resources (the Burnside Bridge extends into the historic district but is listed on the NRHP as an individual resource); 1 building within the East Portland Grand Avenue Historic District is a non-contributing resource; 1 building not within any historic district is recommended not eligible to the NRHP; and 3 buildings, 1 site, and 1 structure not within any historic district are recommended eligible to the NRHP. The Darcelle XV Showplace was listed on the NRHP in 2020. It lies within the Skidmore/Old Town NHL District but is not a contributing resource. It is, therefore, within the APE, but it is not within the API.	Added a statement regarding the Darcelle XV Showplace.

Draft EIS Location	Revised Content	Revision Notes
Section 3.11.1 (page 3-140)	In total, there are 29 resources within the API currently listed on the NRHP as either contributing resources in the Skidmore/Old Town NHL District and 8 resources eligible for listing (see Appendix A of Attachment M, the Draft Section 4(f) Analysis). The historic districts and notable individual resources are described below (also see Figure 3.11-1 and Figure 3.11-3). Section 106 Determination of Eligibility Forms were prepared for those historic resources within the API that are more than 45 years old and not previously evaluated for NRHP eligibility. The baseline survey was primarily focused on historic resources within the API. It was also recognized that potential effects on the entire Skidmore/Old Town NHL District and the New Chinatown/Japantown National Register District were to be addressed. The Skidmore/Old Town NHL District – along with the Yamhill Historic District – represents the focus of the initial European American settlement of Portland and its commercial development through the mid- and late nineteenth century and early twentieth century. That significance was considered in the survey and subsequent analysis.	Added a statement about the baseline survey.
Section 3.11.1 (page 3-141)	**Figure 3.11-3. Location of National Register Eligible or Listed Resources~~Highlighted Resources~~**	Revised to include National Register information.

Draft EIS Location	Revised Content	Revision Notes
Section 3.11.1 (page 3-142)	**Burnside Bridge** – The west approach of the Burnside Bridge (Figure 3.11-4), constructed in 1926, is within the Skidmore/Old Town NHL District boundaries (non-contributing), has been the subject of a Historic American Engineering Record (HAER) documentation (Wood Wortman 2006), and is listed individually in the NRHP in 2012 as a part of the Willamette River Highway Bridges Multiple Property District meeting the eligibility requirements under Criterion A and Criterion C (Kramer 2012). When it opened to traffic in 1926, the Burnside Bridge was acclaimed for its use of the double-leaf bascule while also employing a concrete deck for the movable span. The Burnside Bridge remains largely intact and continues to maintain its historic integrity and to convey its period of significance (Kramer 2012). In many ways, the Burnside Bridge can be considered Portland's most iconic bridge. Its design is a notable contrast with the downriver Steel and Broadway Bridges and the upriver Morrison and Hawthorne Bridges, all of which are truss bridges. The Burnside Bridge is one of only three bascule-lift bridges in Portland (the other two are the Broadway and Morrison Bridges) and only the only Strauss-type bascule bridge. It was one of the first Strauss-type bascule-lift bridge constructed in the United States, and its concrete pavement makes it one of the heaviest such bridges. For many Portlanders, the integration of architecturally influenced elements such as the operator towers makes it the most aesthetically pleasing bridge in the city center. The bridge has served for decades as the route for the Rose Parade crossing the Willamette River to the city center; the parade has been a culturally and socially defining event in Portland for over a century. The bridge's central position in the city has also made it a focus of protest actions and marches in the recent past.	Added information about the bridge's architectural and political importance.
Section 3.12.1 (page 3-152)	The Project's Area of Visual Effect (AVE) (see Figure 3.12-1) defines the space from which the proposed Project would be seen and the area that would be seen from the proposed Project. Note that while the Project would be visible from many areas outside the AVE, the boundary has been defined by the area in which visual changes have the potential to be significant.	Added information about the boundary of the AVE.

Draft EIS Location	Revised Content	Revision Notes
Section 3.14.1 (page 3-174)	Within the API, on the west side of the Willamette River, 7.1 acres of impervious surface generate stormwater managed by the City of Portland ~~or Multnomah County~~. Stormwater collection and conveyance facilities within the API are present, but water quality treatment meeting NMFS standards for metals removal does not occur. On the east side of the Willamette River, stormwater collection and conveyance systems are present within the API. A small portion of stormwater generated by impervious surfaces (0.5 of 10 acres of impervious surface) that is managed by the City ~~or Multnomah County~~ receives water quality treatment via stormwater planters. These planters are assumed effective at removing total suspended solids, dissolved nutrients, and heavy metals. Runoff from 1.6 acres of the existing bridge deck is currently collected by deck drains, treated in media cartridge filters, and then discharged directly to the Willamette River. The stormwater management of the bridge deck is maintained by Multnomah County. Runoff from 1.1 acres of the existing bridge deck is discharged to the combined sewer overflow (CSO) system on the west bank, 1.0 acre is discharged to the stormwater-only system on the east bank, and 0.6 acres are discharged to the CSO system on the east bank. The existing stormwater treatment facilities on the bridge are effective at treating runoff for total suspended solids and phosphorous, but are not certified to remove heavy metals or other pollutants of concern. Table 3.14-1 summarizes the existing stormwater drainage system discharge acreages for the locations mentioned above. Figure 3.14-2 displays the areas drained by each of the existing stormwater drainage systems.	Revised to clarify management responsibilities.
Section 3.16.1 (page 3-191)	Vegetation provides ecological functions to a variety of environments. It provides habitat and food sources for wildlife, improves air quality, provides in-stream shade, filters stormwater, and contributes to flood control. Even though the API is highly developed, the existing vegetation provides important functions to the immediate surroundings, affecting natural resources. The total amount of existing vegetation in the API is approximately 2.5 acres and approximately ~~325~~ 409 trees (see Figure 3.16-2).	Revised the number of existing trees in the API.

Draft EIS Location	Revised Content	Revision Notes
Section 3.16.1 (page 3-193)		Revised to change the number of trees shown.

Draft EIS Location	Revised Content	Revision Notes
Section 3.16.2 (page 3-199)	**Table 3.16-3. Temporary Construction Activities Causing Impacts to Vegetation, Wildlife, and Aquatic Species for All Build Alternatives**	Revised number of trees affected.

Alternative with Lift Option	Piles below OHWM	Area of Piles below OHWM (square feet)	Piles in SWH	Area of Piles in SWH (square feet)	Cofferdam Area (acres)	Lost Vegetation /Wildlife Habitat (acres)	Trees Removed	Duration of Construction (years)
Retrofit	160–220	500–700	25–35	80–110	1.1	1.1	~~9~~115	3.5
Short-span with Bascule Lift	160–220	500–700	25–35	80–110	1.5	1.3	~~9~~117	4.5
Short-span with Vertical Lift	160–220	500–700	25–35	80–110	1.2	1.3	~~9~~117	4.5
Long-span with Bascule Lift	160–220	500–700	25–35	80–110	1.1	1.3	~~9~~117	4.5
Long-span with Vertical Lift	160–220	500–700	25–35	80–110	0.8	1.3	~~9~~117	4.5
Couch Extension with Bascule Lift	160–220	500–700	25–35	80–110	1.6	1.3	13~~2~~4	4.5
Couch Extension with Vertical Lift	160–220	500–700	25–35	80–110	1.3	1.3	13~~2~~4	4.5

Notes: OHWM = ordinary high water mark; SWH = shallow water habitat

Draft EIS Location	Revised Content	Revision Notes
Section 3.16.2 (page 3-199)	**Permanent Impacts** – The permanent impacts to shallow water habitat from the Retrofit Alternative are the same as from the Short-span and Long-span Alternatives (211 square feet), and smaller than from the Couch Extension (231 square feet). ~~Although shallow water habitat is critical to juvenile salmonids, the permanent impacts are relatively minor when considering the amount of existing shallow water habitat in the project area (approximately 3.4 acres) and within the API (approximately 236 acres). This physical reduction in habitat would likely not affect fish long term due to nearby areas of shallow water habitat located in and adjacent to the project area, both upstream and downstream. However, these impacts could be exacerbated in the long term by changes in streamflow due to climate change.~~Although one area of shallow water habitat (SWH) would be permanently reduced, the removal of Pier 4 would result in the creation of 1,789 square feet of SWH on the east side of the river, which would lead to a net increase of SWH from the Project ranging from 1,558 square feet to 1,578 square feet, depending on replacement alternative (the Retrofit Alternative would not result in a net increase in SWH as Pier 4 would not be removed). The Short-span and Couch Extension Alternatives would require replacement columns near the area where Pier 4 was removed, but the columns would all be located outside of SWH. The Long-span Alternative would not require replacement columns. The Retrofit Alternative would have 1.4 acres area of permanent structure below OHWM that could affect aquatic species by decreasing available habitat, or about 0.2 to 0.6 acres more than with the replacement alternatives, and about 1 acre more than the existing bridge.	Revised text to include the creation of SWH from the removal of Pier 4. This results in a net increase in SWH from the replacement alternatives.

<table>
<tr><th>Draft EIS Location</th><th>Revised Content</th><th>Revision Notes</th></tr>
<tr><td>Section 3.16.2
(page 3-200)</td><td>
<h3>Impacts from Potential Active Transportation Access Options</h3>
Options with stairs and elevators and options with ramps are being considered for providing direct bicycle, pedestrian, and ADA access between the Vera Katz Eastbank Esplanade and the Burnside Bridge deck (see figures in Draft EIS Attachment G and detailed descriptions of the options and impacts in the EQRB Active Transportation Access Options Memorandum [Multnomah County 2021a]). All of the options would require new fill in the river, although the options with only stairs and elevator(s) (no ramps) would require a much smaller footprint in the river, and substantially less impact to the riparian area and upland vegetation. The ramp options would remove up to 23~~0~~ existing trees south of the bridge. The existing riparian area is generally low quality~~ in this area~~.
</td><td>Revised number of trees affected.</td></tr>
<tr><td>Section 3.16.2
(page 3-200)</td><td>
Option 2 (stairs and elevator on south side) would have the least amount of proposed permanent fill and temporary fill and would have the least impact on fish and aquatic habitat, followed by Option 1 (elevator and stairs on both sides of the bridge). Options 3 (ramps on both sides) and 4 (ramps on south side only) would have the same amount of proposed permanent and temporary fill, but Option 3 would result in approximately 10 percent more permanent fill placed within shallow water habitat. Option 3 would have the largest impact on both aquatic species and habitat. See Table 3.16-5 for in-water impacts from each option.

Table 3.16-5. Summary of Temporary and Permanent In-Water Impacts from Access Options
<table>
<tr><th>Option No.</th><th>Eastbank Option</th><th>Permanent Fill</th><th>Temporary Fill</th></tr>
<tr><td>1</td><td>Stairs/elevator on north and south sides</td><td>3,200 cu. yd.
(half on each side of bridge, all in SWH)</td><td>600 cu. yd. fill
5,000 cu. yd. of riprap removal</td></tr>
<tr><td>2</td><td>Stairs/elevator south side only (mid-block crossing)</td><td>1,600 cu. yd.
(all placed south of bridge in SWH)</td><td>600 cu. yd. fill
2,600 cu. yd. of riprap removal</td></tr>
<tr><td>3</td><td>Ramps on north and south sides</td><td>19,200 cu. yd.
(roughly half on each side of bridge, ~80% in SWH)</td><td>1,000 cu. yd. fill
23,000 cu. yd. of riprap removal</td></tr>
<tr><td>4</td><td>Ramps on south side only (mid-block crossing)</td><td>19,200 cu. yd.
(placed on south side of bridge, ~70% in SWH)</td><td>1,000 cu. yd. fill
23,000 cu. yd. of riprap removal</td></tr>
</table>
Notes: cu. yd. = cubic yards; SWH = shallow water habitat
</td><td>Added impact information for each option.</td></tr>
</table>

Draft EIS Location	Revised Content	Revision Notes
Section 3.16.2 (page 3-201)	**Table 3.16-6. Required Permits, Compliance, and Authorizations Related to Vegetation, Wildlife, and Aquatic Species**	Revised to change Greenway Review to River Review.

Permit Type	Jurisdiction	Notes
Section 7 Consultation/Biological Opinion	NOAA Fisheries and USFWS	Required for impacts to ESA-listed species. A Biological Opinion would be written specifically for the Project.
Magnuson Stevens Act Essential Fish Habitat Consultation	NOAA Fisheries	Required for impacts to designated Essential Fish Habitat, which is present in the API
Marine Mammal Protection Act	NOAA Fisheries and USFWS	Compliance required due to marine mammal potential occurrence
Fish and Wildlife Coordination Act	USFWS	Compliance required due to modification of the Willamette River
Bald and Golden Eagle Protection Act	USFWS	Compliance required due to potential of species occurrence
Migratory Bird Treaty Act	USFWS	Compliance required to do potential of species occurrence
Section 404	USACE	Triggered by removal or fill in waters of the United States
Removal-Fill	DSL	Triggered by removal or fill in waters of the State
Oregon Endangered Species Act	ODA and ODFW	Potential impacts to species listed as threatened or endangered
Oregon Fish Passage Plan	ODFW	Triggered by projects with major structural upgrades
Title 11 – Tree Permit	City of Portland	All trees that would be disturbed or removed need a tree removal permit
~~Title 33 – Greenway Review~~	~~City of Portland~~	~~Requires review for impacts within greenway overlay zone~~
Title 33 – River ~~Environmental Zone~~Review	City of Portland	~~Mitigation required for all impacts~~Requires review for impacts within River Eenvironmental overlay zone

Notes: DSL = Oregon Department of State Lands; NOAA = National Oceanic and Atmospheric Administration; ODA = Oregon Department of Agriculture; ODFW = Oregon Department of Fish and Wildlife; USACE = US Army Corps of Engineers; USFWS = US Fish and Wildlife Service.

Draft EIS Location	Revised Content	Revision Notes
Section 3.16.4 (page 3-202)	During construction, best management practices would be implemented to minimize impacts and disturbance to vegetation, wildlife, and aquatic species from in-water work, disturbance to vegetation, erosion control, nighttime construction (lighting) and containment of construction materials. Actions including minimizing disturbance areas and cleaning plant materials from equipment and gear help would reduce the spread of invasive plant species. Riparian vegetation removed for construction would be replaced. City requirements include mitigating riparian impacts at ~~a minimum 1.5:1 ratio, and replacing removed trees at a ratio of 2:1~~different ratios depending on the location and species of tree. Exact mitigation ratios would be determined during permitting processes through coordination with the City of Portland. Trees to be preserved in the API would be flagged during construction or have temporary fencing placed around them. The tree protection plan may identify and prescribe alternative construction methods and additional tree protection necessary for tree preservation. Trees to be removed could potentially be preserved off-site during construction, with the possibility of being replanted on-site once construction has been completed. Although this approach would not be feasible for all trees anticipated for removal, it could be an option for some trees, pending further analysis.	Revised statement about mitigation ratios, and added a statement about tree protection.
Section 3.17.1 (page 3-204)	Wetlands and waters within the API were characterized using a variety of published sources and databases, as well as a field survey conducted on June 19, 2019, on the east bank of the Willamette River. No field survey was conducted on the west bank of the river since the area within the API there is comprised of the Portland Harbor Wall. The survey identified the Ordinary High Water Mark (OHWM) of the river, which establishes the limits of jurisdiction for wetlands and waters under federal (Section 404 of the Clean Water Act) and state (Oregon Removal/Fill Law) regulations. Additionally, the City of Portland uses the ~~OHWM~~ top of bank to determine the riverward edge of a 50-foot setback required by the City for buildings and other structures that are not river-dependent. The location of the OHWM on both banks of the river in the API is shown in Figure 3.17-1.	Revised to indicate top of bank.

Draft EIS Location	Revised Content	Revision Notes
Section 3.19.1 (page 3-227)	The US Environmental Protection Agency (EPA) has designated the project area as being in attainment for meeting standards for all criteria pollutants as of 2017. Of primary concern for air pollutants from transportation sources are nitrogen oxides (NO_x), volatile organic compounds (VOCs), carbon monoxide (CO), particulate matter (PM_{10} and $PM_{2.5}$), and mobile source air toxics (MSATs). In the 1970s, pollution concentrations in the Metro area exceeded the CO National Ambient Air Quality Standards (NAAQS) frequently. Maintenance plans were enacted to help with reducing these emissions in combination with technology improvements. The area was re-designated from nonattainment to attainment for CO in 1997 with an approved maintenance plan. The area has now completed the 20-year maintenance period; however, the air quality state implementation plan is still in effect. ~~The area was re-designated as being in attainment for CO in 2017 after completing the 20-year maintenance plan; however, the maintenance plan is still in effect.~~ A review of Oregon Department of Environmental Quality (DEQ) monitoring data for the most recent 3 years (2016 to 2018) indicated levels nearest the project area are below the corresponding NAAQS. Furthermore, DEQ 10-year monitoring data indicate that criteria pollutant concentrations have been decreasing in the Portland region. As with criteria pollutants, air toxics have also been declining since monitoring commenced in the area in 1999. The data indicate that most pollutants are trending downward; however, some such as benzene, are trending downward but still remain above the state's health benchmarks (i.e., a one in a million chance of developing cancer over an individual's lifetime). These benchmarks are for evaluation and planning purposes and not considered standards such as NAAQS. See the *EQRB Air Quality Technical Report* (Multnomah County 2021c) for details of the analysis.	Revised statement regarding attainment for carbon monoxide.

Draft EIS Location	Revised Content	Revision Notes
Section 3.19.2 (page 3-227)	Under the No-Build Alternative, the proposed action is not implemented, and the area is anticipated to remain in attainment with all current NAAQS. Furthermore, with more stringent EPA regulations on vehicle engines and fuels having larger impact as the fleet turns over, future criteria pollutant emissions are expected to decrease compared to existing conditions.~~Under the No-Build Alternative, the proposed action is not implemented, and the area would remain in attainment with all NAAQS. Furthermore, with stricter EPA regulations for vehicle engines, fuels, and vehicle turnover over time, future pollutant emissions are expected to decrease compared to existing conditions.~~ Finally, there would be no Burnside Bridge construction associated with the No-Build Alternative, therefore, no construction emissions would be expected. Emissions from maintenance activities would be higher and more frequent than with the build alternatives. No indirect air quality impacts are expected under the No-Build Alternative.	Revised statement regarding anticipated No-Build attainment.
Section 3.20.4 (page 3-236)	Property Acquisition Mitigation Measures Environmental due diligence, which is recommended for all properties to be acquired and/or for properties that have significant associated construction activities, can take many forms, typically including the completion of an ASTM E1527-21–compliant Phase I Environmental Site Assessment (ESA) and/or a Phase II ~~Environmental Site Assessments~~ESA. The focus of environmental due diligence is to determine the potential for environmental liability (existing contamination, current operational practices, construction worker health and safety, etc.) associated with a particular property and then planning and designing measures to mitigate risk to the properties prior to construction. The Phase II ESA can also be completed prior to construction where excavation, trenching, dewatering, or other subsurface activities are expected to occur. The Phase II ESA can be designed to include both soil and groundwater sampling from environmental borings to assess subsurface conditions and the potential for contamination that might be encountered during the project. Results of the Phase II ESA can be used to develop a site-specific contaminated media management plan and characterization of project spoils for management, worker protection, and disposal options.	Added more information about environmental site assessments.