

April 1, 2019

Matt Garrett
Director
ODOT Region 1
123 NW Flanders Street
Portland, OR 97209

RE: I5 Rose Quarter Environmental Assessment Comments

Dear Mr. Garrett:

Thank you for the opportunity to respond to the Final Environmental Assessment (EA) for the proposed I-5 Rose Quarter project. In general, the City, Office of Management and Finance and the Portland Trail Blazers are supportive of the project. The Rose Quarter is Oregon's premiere large arena event destination and is a major regional economic driver and cultural asset. The City and the Portland Trail Blazers have a long-standing relationship at the Rose Quarter event campus which includes two arenas, accessory buildings, and several parking garages. The City and the Portland Trail Blazers both own land, have invested significant capital in our facilities, and have an ongoing financial stake in the continued success of the Rose Quarter.

We have been following the progress of this project for many years and support it because of its benefits to the local area and the regional transportation system. However, we are concerned about the negative impact the proposed local street configuration would have to the operations on the Rose Quarter campus, especially the ability of guests to efficiently access our venues with a minimum of effort and impact on our surrounding area. One specific failing of the design proposed in the EA comes in the removal of any direct route for guests leaving Rose Quarter garages to access the new freeway ramp at Weidler and I-5. If the current plan for those surface streets isn't revised, this change will create enormous delays for our customers' post event departure and will result in increased traffic and gridlock on the surrounding surface streets of the neighborhood on a regular basis. However, we are confident this can be fixed during the design phase of the project.

Our concern is focused on how the street configuration impacts the access to and egress from the parking garages that provide spaces for events in the Moda Center and the Veterans Memorial Coliseum (VMC). We can't support the current street configuration as described in the Traffic Analysis Technical Report (Pg. 80 – Section 6.2.3) as it won't meet the needs of the Rose Quarter campus. The elimination of N Williams and the relocation of the SB I-5 onramp would require significant out-of-direction travel from the garages to exit the area, funnel essentially all event traffic through several constrained intersections - creating increased pedestrian/vehicle conflicts, and greatly increasing the amount of time it takes to empty the garages. Furthermore, the EA's proposed mitigation of rerouting traffic northbound on N Wheeler by way of cones and flaggers after all events is financially unsustainable and potentially unsafe.

The City is a major landowner in the Rose Quarter and partners with Portland Trail Blazers' sister company, Rip City Management (RCM), who manages the Moda Center, VMC, garages, and entertainment complex. The Rose Quarter is a major economic driver in the region, and events there





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generate significant revenues through ticket taxes and parking fees for the City. These revenues support the ongoing maintenance, repair and improvement of the venues as well as covering bonded debt payments associated with spectator venues in Portland. An acceptable street configuration in the Rose Quarter needs to work all the time, not just for big events. Between the Moda Center and the VMC there are over 30,000 seats, but the three garages have only a total of 2,600 spaces so they regularly fill for even mid-sized events.

In the twelve months ended June 30, 2018, the VMC hosted over 130 events with a total of 450,000 attendees while the Moda Center and surrounding commons held over 170 events with a total of 1,500,000 attendees. Current street configurations allow mid-sized events to empty with a minimum of traffic control flaggers, and even major events do not require the level of manual traffic control that would be required by the configuration as shown in the EA. Having flaggers switch traffic operations hundreds of times a year is horribly inefficient and not an economically viable option. Modifications to the street system required after large events should be minimized. A more permanent solution is necessary.

There are some alternative solutions that are supported by RCM and the City as outlined in the 2016 report: *Moda Center – Post Event Traffic Analysis*. This study was conducted by ODOT consultant AECOM and puts forth two options which would work better for the Rose Quarter, both of which call for N Wheeler to be permanently configured as a two-way street. Option 4 (Attachment 4) in that study is the preferred option. This configures N Wheeler as a four-lane road with two lanes in each direction. It also realigns N Wheeler with the Garden Garage exit. Option 1 (Attachment 1) configures N Wheeler as a three-lane road with either one southbound lane and two northbound lanes or an easily convertible center lane that is only used during events.

RCM and the City understand that garage egress times may increase slightly due to needed active transportation improvements and other development, but ideally, we would like the time it takes to empty the garages after events to stay the same or decrease with the project. Unfortunately, the configuration shown in the current EA configuration significantly increases egress time beyond what's tolerable for event goers. According to the 2016 study, it takes 25 minutes for the Garden Garage to empty after a Trail Blazers game. This study found that the proposed configuration changes in the EA could more than double the time for the garage to empty. This would have the negative effect of discouraging parking in the public parking facilities at the Rose Quarter, or worse, reducing attendance at events due to parking challenges. Prior to selecting a final street circulation design, we request that an analysis, similar to the 2016 AECOM report be undertaken to ensure that the impacts on post-event traffic controls will not significantly increase the time it takes to empty the garages.

The alternative solutions studied in 2016 provide better access and egress to garages on a day to day basis as well as during major event times than the option shown in the EA documents. They don't require as frequent or extensive traffic operation changes, so it is both easier to navigate and safer for both drivers, traffic management staff, and pedestrians. Finally, these alternatives are less financially burdensome for RCM and minimize the financial risk to the City and RCM associated with event and parking revenues. It is also important to remember that the ultimate solution to the local street network must work for the Rose Quarter of today, but also work for the Rose Quarter of the future. City policies from the recently adopted

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Central City 2035 plan suggest a much busier urban district – not an episodic event center. The street network needs to work at all times for all modes, even with a broader mix of uses and new development in and around Rose Quarter.

The shortcomings of the current proposed local circulation design for event egress have been a known issue since the 2012 Oregon Transportation Commission adoption of the I-5 Broadway/Weidler Interchange Improvements Facility Plan. That document calls out the need to further refine local circulation alternatives within the Rose Quarter to enhance circulation for all modes and develop a system that accommodates event ingress and egress. See the Facility Plan, Implementation Actions, Specific Design Coordination, (5)(c). It is disappointing that little has been accomplished in this regard since 2012. Thank you for the opportunity to comment on this EA. As noted above, we believe the impacts of this project to be generally positive, and we are confident that our concerns can be addressed during the design phase. We believe this solution will not only help Rose Quarter operations but go toward improving the functionality of the entire district.

Sincerely,



Chris McGowan
President & CEO, Portland Trail Blazers



Tom Rinehart
Chief Administrative Officer, City of Portland

