Bill Elliott

RE: Draft SEIS Deschutes Estuary Restoration Project – Transportation – Street Closure – Significant Unavoidable Adverse Impacts

References -
Draft SEIS section 3.4.2.2, Construction Impacts - Street Closure (pgs. 71 & 72) states,
". . . the updated Project design would require Deschutes Parkway SW to be closed between Lakeridge Drive and 5th Avenue to through traffic for up to 3 years during construction (open to local traffic only), as shown on Figure 3.7. The extended closure would be necessary to safely construct the new roundabout at the intersection of Deschutes Parkway SW, Olympic Street, and the new bridge approach. - - - Maintaining traffic through the work zone while constructing the roundabout would not be feasible due to space constraints, worker and public safety considerations, and the complexity of the roadway improvements."
". . . this SEIS conservatively assumes that the roadway segment could remain closed to through traffic for up to approximately 3 years. Detoured vehicles and buses would be required to use alternative routes. This would increase travel time between the north and south ends of the lake, which would constitute a significant transportation impact."

Draft SEIS section 3.4.2.4, Significant Unavoidable Adverse Impacts (pg. 73) states –
"During construction, the extended Deschutes Parkway SW closure and detour would increase travel time between the north and south ends of the lake, which would constitute a significant unavoidable impact."

Comment -
The proposed long-term temporary closure of Deschutes Parkway SW is described as necessary to construct the new roundabout at the intersection of Deschutes Parkway SW, Olympic Street, and the new bridge approach. The need for temporary street closure is clear.

No explanation/justification is provided for the proposed closure duration of "up to 3 years." That duration appears to be quite generous (long) for construction of the described project scope items. Considering that this street closure would constitute a significant impact, efforts/options to minimize the duration of the public impact should be described. Section 3.4.2.3, Mitigation Measures (pg. 72) states nothing about attempts or intent to constrain/reduce the duration of the long-term temporary street closure impact. I find nothing in the Draft SEIS describing why a 3-year duration closure is unavoidable.

A tenet of project management is that "all tasks expand to fill the available time." As written, the SEIS will define a 3 year "allowance" for closure of Deschutes Parkway SW to public traffic. If that is established, there's little chance it will actually be less.

With assertive/intensive effort, it is highly probable that construction of the new roundabout at the intersection of Deschutes Parkway SW, Olympic Street, and the new bridge approach can be completed in well under 3 years. If Ecology and the GCCM have concluded 3 years will be necessary to build the described items, an explanation of that analysis should be included in the SEIS. Without that, the proposed duration of this significant impact can't be accurately characterized as unavoidable.