



# Equity Report

Multnomah County | Earthquake Ready  
Burnside Bridge Project

*Portland, OR*

January 29, 2021





# Earthquake Ready Burnside Bridge Equity Report

*Prepared for*

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Contract# DCS-SVCSGEN-857-2019-conv  
HDR Project #10144814



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## Acronyms, Initialisms, and Abbreviations

ACS	American Community Survey
ADA	Americans with Disabilities Act
AMR	American Medical Response
API	Area of Potential Impact
BES	Bureau of Environmental Sciences
CSZ	Cascadia Subduction Zone
EIS	Environmental impact statement
EPA	U.S. Environmental Protection Agency
EQRB	Earthquake Ready Burnside Bridge
FHWA	Federal Highway Administration
GIS	Geographic information system
LEP	Limited English proficiency
NEPA	National Environmental Policy Act of 1969

# 1 Introduction

As part of the preparation of the Environmental Impact Statement (EIS) for the Earthquake Ready Burnside Bridge (EQRB) Project, environmental justice effects of the Project within the Project's Area of Potential Impact (API) were assessed to determine disproportionate and adverse impacts on low-income and minority populations in response to requirements of Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. That information and analysis is included in the *EQRB Environmental Justice Technical Report* (Multnomah County 2021b). In addition to the assessment of environmental justice effects, the EQRB Project also assessed potential environmental effects on equity populations within the API.

The environmental justice analysis examined whether the Project Alternatives (including the No-Build Alternative) have the potential to result in disproportionately high and adverse effects on minority or low-income populations or communities. The equity assessment considers whether impacts and benefits may affect other historically marginalized populations that are not considered environmental justice communities under Executive Order 12898. Such populations are identified using relevant local information and input generated through public outreach and involvement programs, field visits, open houses, and community workshops including information the EQRB Diversity, Equity, and Inclusion program.

## 2 Definitions

### 2.1 Equity Demographics

The following terminology is used when discussing different populations within the context of environmental justice and equity.

- Disability – A long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business (U.S. Census n.d.).
- Environmental Justice – Separately and individually, racial and ethnic minority and low-income populations are referred to as environmental justice populations. This definition is based on populations identified in Title VI of the Civil Rights Act of 1964 and clarified in Presidential Executive Order 12898: Executive Order on Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations.
- Equity – This analysis uses the term equity to capture other minority groups not included in environmental justice populations (racial minority and low-income populations) that may be disadvantaged and that could be impacted by the EQRB Project. This definition incorporates other groups identified in the City's A Framework

for Equity, which states: “Portland is a place where your future is not limited by your race, gender, sexual orientation, disability, age, income, where you were born or where you live” (City of Portland 2012). Specifically, this analysis considers whether there are concentrated minority populations related to age groups, disability, gender, or sexual orientation.

- Low-Income – Low-income is defined in the U.S. Census as a person whose household income is at or below the U.S. Department of Health and Human Services poverty guidelines of \$25,750 (2019 guidelines) for a family of four. For the purposes of this analysis, to account for a higher regional cost of living, the threshold for low income is considered to be double this guideline, \$51,500. Doubling the guideline also helps account for future inflation and further increases in the regional cost of living.

For the purposes of the equity analysis, homeless individuals and people accessing low-income social services through organizations such as the Portland Rescue Mission were also considered when assessing broad-based environmental impacts to low-income populations that would be disproportionately and adversely impacted by the Project.

- Minority – The U.S. Census defines minority individuals as those who identify as being either from a racial or ethnic minority:
  - Black or African American – A person having origins in any of the black racial groups of Africa.
  - Asian – A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
  - American Indian or Alaska Native – A person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment.
  - Native Hawaiian or Other Pacific Islander – A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
  - Some other race – Includes all other responses not included in the White, Black or African American, American Indian/Alaska Native, Asian, and Native Hawaiian or Other Pacific Islander race categories described above.
  - Hispanic or Latino – A person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

Respondents reporting entries such as multiracial, mixed, interracial, or from a specific Hispanic or Latino group (for example, Mexican, Puerto Rican, Cuban, or Spanish) in response to the race question are also included as minority individuals.

- Youth – Individuals 18 years or age or younger are considered potential equity populations given the proportion of minorities that constitute younger cohorts. According to the Pew Research Center, approximately 48 percent of 6- to 21-year-olds in 2018 are non-white minorities. Project impacts to destinations or

services that are used more frequently by younger cohorts are assessed for potential disproportionate effects to environmental justice and equity communities.

## 3 Legal Regulations and Standards

### 3.1 Equity Policies

FHWA Guidance on Environmental Justice and NEPA (FHWA 2011) does not require that an EIS specifically address disproportionately high or adverse effects on equity populations. However, equity populations were considered as part of this process in alignment with the broader equity policies of Multnomah County, as well as the EQRB DEI Program.

While equity populations are not specifically cited in FHWA environmental justice guidance, equity populations such as people with disabilities and older adults are either directly or indirectly protected via other federal legislation:

- Title VI of the Civil Rights Act of 1964
- Age Discrimination Act of 1975
- Americans with Disabilities Act of 1990
- Presidential Executive Order 12898 – Federal Actions to Address Environmental Justice to Minority Populations and Low-Income Populations
- Presidential Executive Order 13166 – Improving Access to Services for Persons with Limited English Proficiency
- U.S. Department of Transportation Order 5610.2(a) – Order to Address Environmental Justice in Minority Populations and Low-Income Populations
- Title 42 United States Code Section 4601, Uniform Relocation Assistance and Real Property Acquisition Policies for Federal and Federally Assisted Programs
- Title 49 of the Code of Federal Regulations (CFR) Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964
- Community Impact Assessment: A Quick Reference for Transportation, Publication No. FHWA-HEP-18-055 (2018)

### 3.2 Resource Identification and Evaluation Methods

#### 3.2.1 Published Sources and Databases for Equity

The primary sources of data for demographic information used to assess impacts to environmental justice populations are the American Community Survey 5-Year Estimates from the U.S. Census Bureau. For the direct impact API, the analysis identifies the minority and low-income representation of census block groups and compares this to what is recorded for Multnomah County.

Additional data sources were used to identify equity populations that are potentially underrepresented in U.S. Census Counts. Per FHWA environmental justice guidance (FHWA 2011), deliberate efforts were taken to ensure relatively small clusters or dispersed populations were not overlooked – namely unhoused populations living in the Project vicinity. This analysis used other localized and relevant information sources such as the 2017–2019 Point-in-Time Count of Homelessness study conducted by Portland State University and Multnomah County to identify groups or clusters of minority or low-income persons in the environmental justice study area that may be underrepresented in U.S. Census counts. Other information used in this analysis includes Multnomah County demographic information published in the U.S. Environmental Protection Agency’s (EPA) EJScreen tool (EPA 2017).

### 3.2.2 Public Outreach

This report is informed by Multnomah County’s broader equity, inclusion, and public engagement program being implemented as part of the Project. Between 2016 and 2018, Multnomah County and local partners have implemented a robust engagement process and technical evaluation to identify the most viable bridge replacement and rehabilitation options to carry into the Environmental Review process. Public input has continued to inform the Draft EIS, which will identify a Preferred Alternative. The public outreach program includes a variety of outreach and communications tools, including:

- Interviews
- Briefings
- Focus groups and working groups
- Committee representation
- Open houses
- Email updates
- Tabling at community events (i.e., markets)
- Surveys
- Website/online engagement tools (i.e., videos)
- Social media engagement
- Newsletters and mailers
- Translated materials

A cornerstone of the public engagement program is to explore environmental justice and equity issues related to the Project. To reach environmental justice and equity populations, the outreach program targeted specific groups of interest, including low-income, minority, homeless, disabled, and other underrepresented or vulnerable community members that could be potentially impacted by the bridge Project.

A brief field survey was conducted within the API to identify community facilities and services that are culturally specific and/or of cultural importance to communities of color and immigrant and refugee communities. Additional information was generated from field

surveys performed for the social and neighborhoods analysis being conducted for the Draft EIS and from community outreach activities conducted as part of the Project.

The environmental justice analysis builds on these past and ongoing outreach efforts to identify potentially adverse negative environmental effects and benefits as a result of the Project.

## 3.3 Existing Conditions

### 3.3.1 Equity Group Populations

For the purposes of the EQRB Project, a few key demographics were identified as equity populations in addition to the low-income and minority populations traditionally considered in environmental justice analyses. These are populations that fall outside of a strict review of low-income and minority populations and consider additional demographic characteristics such as housing status, older adults, disabled individuals, and limited English proficiency populations.

#### Unhoused Populations

While shelter resources exist in the vicinity of the bridge – particularly in the west bridgehead area – there are still a considerable number of homeless people who are unable or choose not to use these resources. The 2017–2019 Point-in-Time Count of Homelessness study conducted by Portland State University found that 39.9 percent of Portland’s homeless population were unsheltered. Of the unsheltered, 29.9 percent used streets or sidewalks; 10.4 percent slept in doorways or other private property; 9.8 percent used bridges, overpasses, and rail right-of-way for shelter; and 2.6 percent slept in parks.

The same study found that 345 respondents slept unsheltered in the Downtown/Old Town/Pearl neighborhood. A specific count of homeless people living in the vicinity of the west bridgehead is unknown, but a field survey observed people sheltering within Waterfront Park, below and on the existing bridge between SW/NW 1st Avenue and Naito Parkway, on sidewalks, and in the private doorways.

As the census does not accurately capture unhoused individuals residing within the API, the 2019 Point-in-Time count (Multnomah County 2019) within Multnomah County was used to obtain information regarding this population.[1] A total of 4,015 unhoused people were counted on January 23, 2019. Of this amount, 2,037 people were considered unsheltered (sleeping in a public or private place not ordinarily used as regular sleeping accommodation for human beings), with 435 people being counted in the SE Portland area (Willamette River to 2nd Avenue) and 413 people being counted in the Downtown/Old Town/Pearl neighborhoods. In addition, 1,459 people were in emergency shelters and 519 were in transitional housing. These two locations, both of which intersect with the API, had the highest share of the unsheltered population compared to the other listed locations.

Based on the 2019 counts, 1,769 persons were found to meet the US Department of Housing and Urban Development (HUD) classification of “chronically homeless,” defined as people who have experienced homelessness for at least a year, or repeatedly, or unaccompanied individuals with a disabling condition such as a serious mental illness,

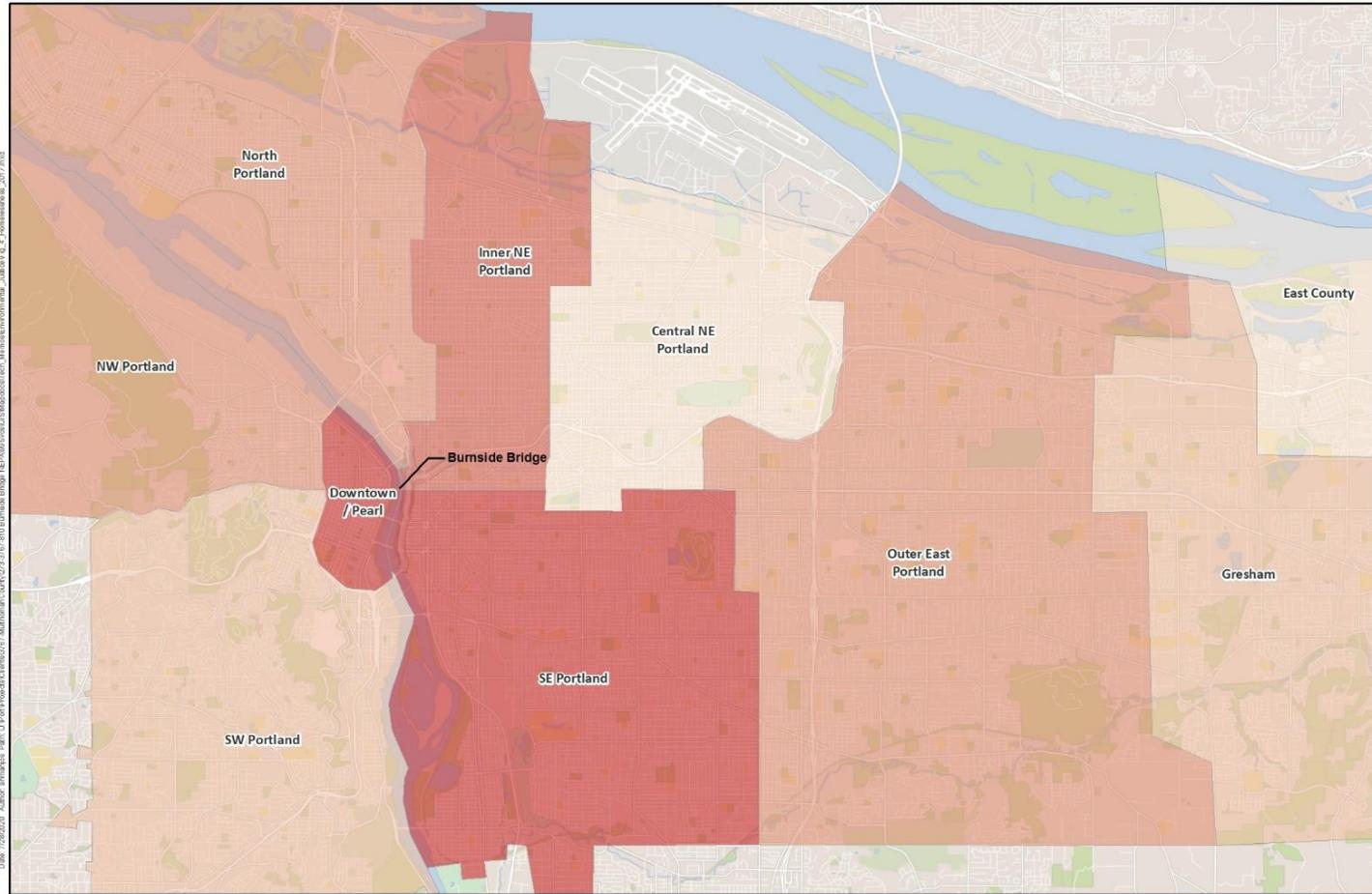
substance use disorder, or physical disability who have had at least four episodes of homelessness in the past 3 years (HUD 2015).

The Point-in-Time report summarized counts at a neighborhood-cluster scale representing eight distinct city areas:

- North Portland
- NW Portland
- Downtown Portland/Pearl District/Old Town
- SW Portland
- Inner NE Portland
- Central NE Portland
- Outer East Portland
- East County / Gresham

The study team approximately duplicated the boundaries used in the Point-in-Time study using imprecise boundaries developed in Google Earth. City-recognized neighborhood boundaries (available on the City's GIS Open Data Portal) were then selected based on overlapping Google Earth boundaries, resulting in more reliable cluster boundaries for the creation of additional maps. Tabulated information from the Point-in-Time report was then joined to the cluster boundaries to display homeless counts for 2017 and 2019, shown in Figure 1 and Figure 2 below. For each of these years, concentrations of homeless individuals were highest in Downtown/Pearl District/Old Town and SE Portland. Figure 3 displays the percent change in reported homeless individuals between 2017 and 2019. Although the Project Area constitutes one of the highest concentrations of homeless individuals in the city, concentrations of homeless individuals have grown faster in other neighborhood clusters – namely North Portland and Central NE Portland. These findings suggest that negative Project impacts would affect a substantial proportion of the city's homeless population in the near-term, particularly shorter-term construction impacts which produce more immediate effects. However, trends indicate that other neighborhoods may capture a larger share of the city's homeless population in the future, potentially reducing the impact of negative Project effects on homeless populations living in the vicinity of the Burnside Bridge.

Figure 1. Point-in-Time – Homeless Count Estimates by Neighborhood (2017)



Source:  
 City of Portland, Oregon  
 HDR, Parametrix



Number of Homeless Households - 2017

- Under 45
- 45 - 64
- 65 - 119
- 120 - 180
- 181 or Higher

Multnomah County  
 Homelessness - 2017

Earthquake Ready Burnside

Figure 2. Point-in-Time – Homeless Count Estimates by Neighborhood (2019)

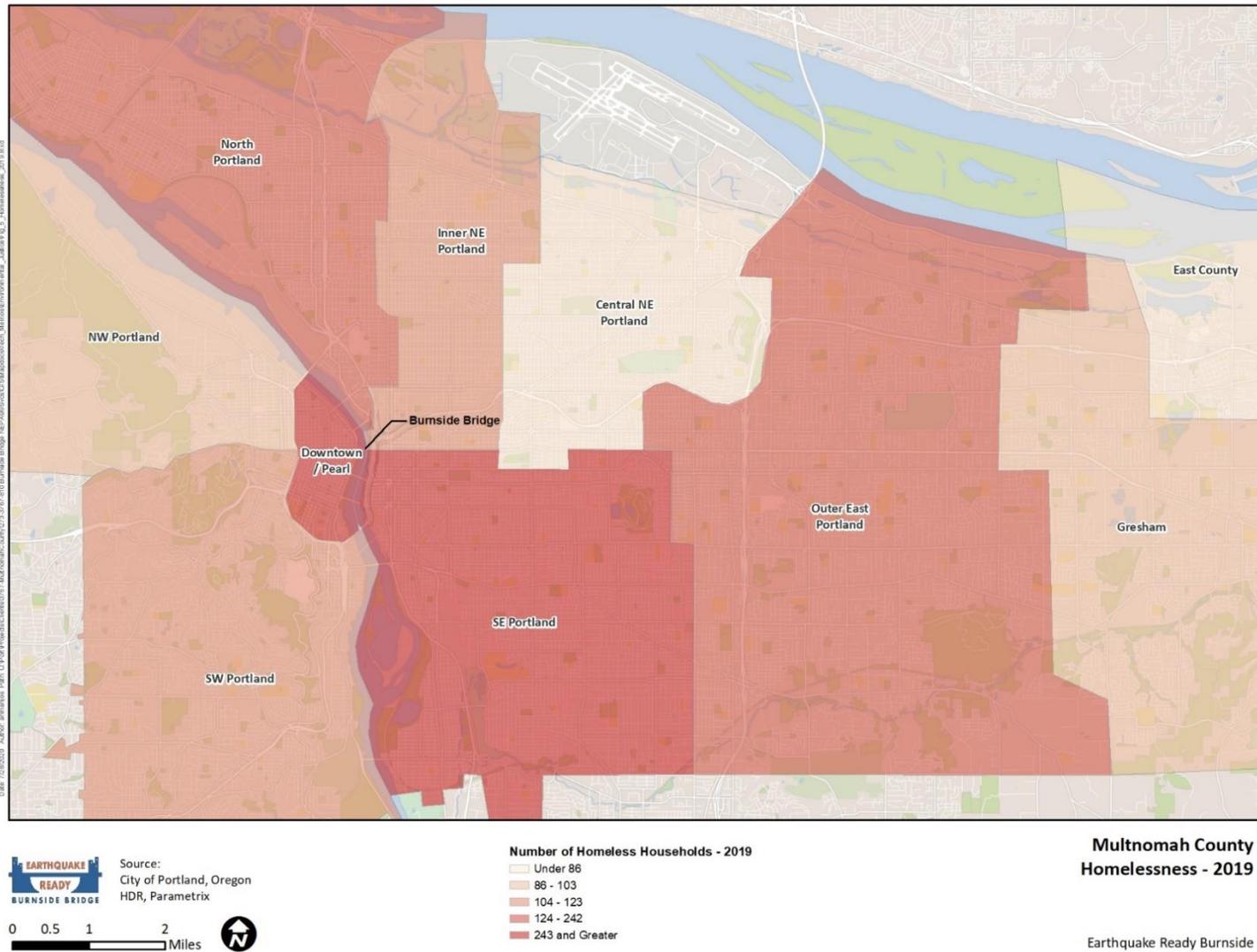
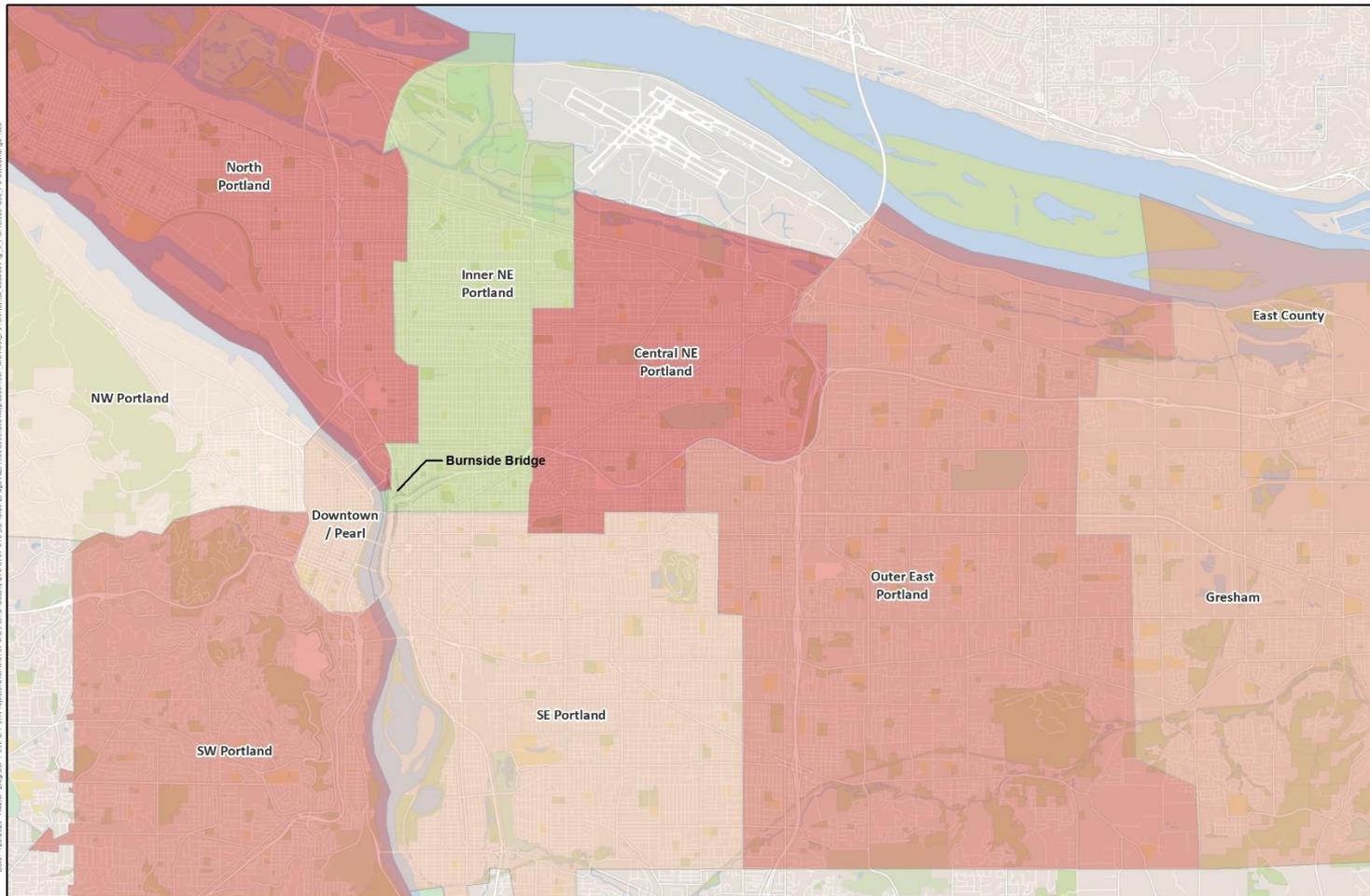


Figure 3. Point-in-Time – Homeless Count Estimates Change from 2017 to 2019



**EARTHQUAKE READY BURNSIDE BRIDGE**

Source:  
 City of Portland  
 City of Portland, Oregon  
 HDR, Parametrix

0 0.5 1 2 Miles

- Percent Change from 2017 to 2019**
- 32% Decrease
  - 1% to 20% Increase
  - 21% to 30% Increase
  - 50% to 75% Increase
  - 100% to 120% Increase
  - 121% Increase or Greater

**Multnomah County  
 Homelessness - Percent Change**

Earthquake Ready Burnside

The 2019 Point-in-Time count determined that those who identified as White Alone made up 58.4 percent of people unsheltered or in shelters while people of color (everyone except those identified as white) made up 38.1 percent of respondents. Based on the general population within Multnomah County, the percentage of American Indian/Alaska Natives, Native Hawaiian/Pacific Islanders, and Black/African Americans in the Point-In-Time count (compared to the general population) indicates a high level of racial diversity in unhoused populations.

Household types (families, adults-only, unaccompanied youth) is an important factor to identify within unhoused populations. In the 2019 count, 91.4 percent of respondents were people in adult-only households. Only 7.9 percent of respondents were households with children, and less than one percent were unaccompanied children.

It should also be pointed out that the Point-in-Time homelessness statistics likely underestimated the true number of homeless individuals, particularly the unsheltered homeless. This was because the Point-in-Time survey was voluntary and target respondents had the right to refuse participation. In 2019, 707 individuals did not wish to participate in the street count portion of the Point-in-Time survey.

While no exact population size is available in this analysis for the number of unhoused individuals within the Project Area or API, the higher presence of unhoused individuals that take shelter in and immediately adjacent to the Project Area is considered an equity group population in this analysis.

### Over 64 Years of Age

Concentrations of persons aged 64 years or more residing within the API are slightly higher, but comparable to Multnomah County as a whole. The percentage of residents over 64 years of age in the API (15 percent) is approximately 2 percentage points higher than that for Multnomah County as a whole (12 percent). As shown in Table 1, relatively high concentrations of these individuals are found in 5 of the 15 census block groups.

**Table 1. Populations over 64 Years of Age**

Percent of total population over 64 years of age within API census block groups.<sup>a</sup>

Census Block Group	Total Population	Percent Over 64 Years of Age
410510011012	1,643	6.5%
410510011011	830	6.0%
410510021002	1,601	9.9%
410510106002	1,509	33.2%
410510050001	3,326	8.7%
410510051002	2,602	18.6%
410510106001	3 650	6.3%
410510106003	985	7.3%
410510023031	862	8.8%
410510023032	1,693	22.9%

Census Block Group	Total Population	Percent Over 64 Years of Age
410510024023	1,188	8.8%
410510051003	1,145	16.3%
410510021001	1,093	10.9%
410510051001	4,401	25.3%
410510052001	1,003	5.0%
<b>API Total</b>	<b>24,531</b>	<b>15.2%</b>
<b>Multnomah County Total</b>	<b>798,647</b>	<b>12.6%</b>

Source: U.S. Census Bureau, American Community Survey 2014–2018 5-Year Estimates

<sup>a</sup> Block groups with concentrations higher than the 15.2% API total are highlighted.

### Disability Population

Census information was evaluated to determine whether the API contains a concentration of individuals with a disability compared to Multnomah County as a whole. Table 2 shows that the percentage of households within the API identified as containing an individual or individuals with a disability is comparable to that found in the County. However, the percent of households with an individual(s) with a disability within API census blocks are approximately 2 percentage points higher than in Multnomah County. The greatest concentrations of households with disabled persons are within census block groups southwest of the Project Area, where the percentage of households with individual(s) with a disability is substantial.

**Table 2. Households with Individuals with a Disability**

Percent of total households identified as having individuals with a disability present

Census Block Group	Households	Percent Household with Individual(s) with a Disability
410510011011	535	25.2%
410510011012	1,004	24.2%
410510021001	640	17.5%
410510021002	841	10.5%
410510023031	490	25.1%
410510023032	1,019	29.2%
410510024023	597	29.6%
410510050001	2,321	7.9%
410510051001	3,002	17.3%
410510051002	1,897	37.7%
410510051003	671	38.9%

Census Block Group	Households	Percent Household with Individual(s) with a Disability
410510052001	621	30.8%
410510106001	520	42.5%
410510106002	1,206	49.2%
410510106003	354	54.2%
<b>Total</b>	<b>15,718</b>	<b>25.8%</b>
<b>Multnomah County Total</b>	<b>321,968</b>	<b>24.0%</b>

Source: U.S. Census Bureau, American Community Survey 2014–2018 5-Year Estimates

### Limited English Proficiency

Table 3 shows the proportion of limited English proficiency (LEP) households in the API compared to Multnomah County. Overall, concentrations of LEP households are slightly lower in the API, yet comparable to Multnomah County as a whole. The percentage of LEP populations within the API is approximately 2 percentage points lower than in Multnomah County.

Table 4 depicts the share of LEP households over time between 2013 and 2018 for the API and Multnomah County. Between 2013–2018, remained relatively constant in both the API and Multnomah County. Between 2013–2018, the concentration of LEP households within the API grew slightly by 0.5 percent. The concentration of LEP households in Multnomah County decreased slightly by 0.8 percent during the same period.

**Table 3. Limited English Proficiency Households**

Block Groups	Total Households	Limited English Proficiency Households
410510011011	535	2.8%
410510011012	1,004	1.9%
410510021001	640	0.0%
410510021002	841	0.0%
410510023031	490	0.0%
410510023032	1,019	1.0%
410510024023	597	0.0%
410510050001	2,321	0.0%
410510051001	3,002	1.1%
410510051002	1,897	1.7%
410510051003	671	0.0%
410510052001	621	4.5%

Block Groups	Total Households	Limited English Proficiency Households
410510106001	520	0.0%
410510106002	1,206	10.5%
410510106003	354	15.5%
<b>API Total</b>	<b>15,718</b>	<b>2.0%</b>
<b>Multnomah County Total</b>	<b>321,968</b>	<b>3.9%</b>

Source: U.S. Census Bureau, American Community Survey 2014–2018 5-Year Estimates.

**Table 4. Limited English Proficiency Households, Change Over Time**

Year	API	Multnomah County
2018 <sup>a</sup>	3.9%	3.9%
2013	3.4%	4.7%
Change 2013–2018	<b>+0.5%</b>	<b>-0.8%</b>

## 3.4 Social and Emergency Service Providers

Social and emergency service providers were considered as part of the equity analysis for the Project. Several equity populations including the chronically homeless, people with disabilities, older adults, and people with limited English proficiency may also rely on these organizations for low-cost or free critical access to housing, nutrition, health care, employment opportunities, case management, and other social services. The following sections describe the social and emergency service providers located on either side of the Burnside Bridge.

### 3.4.1 West Bridgehead

The area surrounding W Burnside from NW/SW 1st Avenue to NW/SW 3rd Avenue is a hub for social services with Central City Concern, Portland Rescue Mission, Union Gospel Mission, and the Liberation Street Church located on W Burnside, and The Salvation Army located on W Burnside and SW 2nd Avenue. Central City Concern, Union Gospel Mission, Portland Rescue Mission, and The Salvation Army provide overnight shelter for homeless individuals. Homeless individuals accessing services at Portland Rescue Mission queue nightly on W Burnside along the north side of the street from NW 2nd Avenue east toward the river. The organization Because People Matter operates their Night Strike event every Thursday under the Burnside Bridge, which provides food and resources to the homeless community. In addition to offering shelter space, the Central City Concern – Shoreline Building on the corner of NW 2nd Avenue and W Burnside provides longer-term transitional housing and the Erickson-Fritz

Apartments on NW 2nd Avenue offer affordable housing. The west bridgehead area also includes Blanchet House, a homeless shelter located on NW Glisan and NW 3rd Avenue.

### 3.4.2 East Bridgehead

On the east side, providers and service centers include Harry's Mother Run-Away Youth, Independent Living Resources (help resources for persons with disabilities), Multnomah County Department of Human Services Child Welfare Office, and two locations of The Salvation Army. In addition, the American Medical Response provides ambulance services (dispatch and fleet maintenances) to Multnomah County, Clackamas County, and Clark County.

There are two social services located within the Jeanne Rivers Building on the corner of NE Martin Luther King Jr. Boulevard and NE Couch Street. The Multnomah County Crisis Assessment and Treatment Center provides a 16-bed facility for people struggling with mental health issues, and the Central City Concern Sobering Station provides temporary assistance for inebriated individuals.

## 4 Environmental Consequences

The *EQRB Environmental Justice Technical Report* (Multnomah County 2021b) and Draft EIS Section 3.9 (Multnomah County 2021a) describe environmental impacts in greater detail, although the main findings and environmental impacts related to equity are summarized below:

- The No-Build Alternative in a post-Cascadia Subduction Zone (CSZ) earthquake scenario would be devastating for equity communities within the Project Area, as cross-river trips would be difficult or impossible for many months, and several buildings that currently house homeless and social services in the West Bridgehead area would be unusable.
- Long-term equity impacts are relatively minimal. The majority of potential equity impacts would result from short-term construction activities in the Project Area.
- Short-term detours for bicycle riders and pedestrians could result in a disproportionately adverse effect on equity populations who rely on these modes for access to social services on either side of the bridge. Out-of-direction travel for bicycles and pedestrians during construction could range from 5 to 20 minutes. Mitigation is proposed to reduce the effect of the bridge closure on equity populations relying on walking or bicycling across the bridge to access social services.
- Short-term noise and vibrations from construction equipment and increased construction traffic could result in a disproportionate and adverse impact on equity populations residing near the bridge. Mitigation is proposed to reduce these impacts.
- Temporary access easements and closures to social service organizations could disproportionately impact equity populations who depend on these services in the area. Design modifications to avoid closing access to social service organizations have been incorporated into the Replacement Alternatives.

## 4.1 Conclusion

The environmental justice and equity analysis concluded that any negative long-term impacts to environmental justice and equity populations would be adequately offset by the Project benefits, especially when compared to the No-Build Alternative in a post-earthquake scenario. All the Build Alternatives would substantially avoid the negative physical and social impacts associated with the collapse of the Burnside Bridge caused by the next CSZ earthquake. A major seismic event would eliminate the ability to use the Burnside Bridge to cross the Willamette River, and it would also severely impact public and social services in the area, including the cluster of organizations in the West API that provide direct services to low-income, minority, and disabled populations.

Because people of low-income, minority populations, older adults, and people with disabilities are likely to depend more on active modes and public transportation, improved access to the Eastbank Esplanade and Skidmore Fountain MAX Station resulting from the Build Alternatives are considered benefits to environmental justice and equity populations living, working, or accessing resources within the API. These benefits, coupled with the proposed mitigation strategies in the *EQRB Environmental Justice Technical Report* (Multnomah County 2021b), are considered to adequately offset negative impacts to environmental justice and equity populations resulting from the Project.

Short-term impacts would include construction-related impacts such as increased truck traffic and related congestion, detours, noise and emission impacts, and temporary access impacts. Short-term access impacts to social service providers have the potential to impact environmental justice and equity populations to a higher degree than the general population, but they would be mostly avoided through design modifications that have been incorporated into the Replacement Alternatives. The Preferred Alternative (Replacement Long-span) would maintain access for clients to the social service providers throughout construction. The Enhanced Retrofit Alternative on the other hand, would require a 3-month construction easement that would disrupt client access to Portland Rescue Mission. For the Preferred Alternative, the short duration of impacts combined with the Project benefits and mitigation measures, would avoid having a net high and adverse effect on environmental justice and equity populations.

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