


From: [Darr Durham](#)
To: [Draft EIS Feedback;](#) 
CC:
Subject: DEIS Comments from 1000 Friends of Oregon
Date: Tuesday, July 01, 2008 2:41:30 PM
Attachments: [CRC DEIS comments 7-1-08.pdf](#)
[Metro re CRC 6-5-08.doc.pdf](#)
[Oregonian on CRC 6-22-08.pdf](#)

TO: Ms. Heather Gunderson, Columbia River Crossing Project
FROM: 1000 Friends of Oregon
RE: DEIS Comments from 1000 Friends of Oregon

Three items:

July 1, 2008 comment letter
Copy of comment letter to Metro government, June 5, 2008
Copy of *Oregonian* article, June 22, 2008

Also sent via fax. If you have any problems with these attachments, please call or email. Thanks!

Darr

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(Ms.) Darr Durham
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July 1, 2008

Ms. Heather Gunderson
c/o Columbia River Crossing Project
700 Washington Street, Suite 300
Vancouver, Washington 98660

*Transmitted via fax: 360-737-0294
and email: DraftEISfeedback@columbiarivercrossing.org*

Re: Columbia River Crossing DEIS

Dear Ms. Gunderson,

1000 Friends of Oregon (1000 Friends) submits these comments on the Columbia River Crossing (CRC) draft environmental impact statement (DEIS). On behalf of 1000 Friends, I request that this letter and its attachments be made part of the record and be responded to by the Federal Highway Administration in its final environmental impact statement for the CRC.

As explained below, the DEIS fails to address important environmental impacts of the CRC as proposed, and ignores laws, policies and goals adopted by the states of Oregon and Washington, in violation of 23 CFR 771.105 and 40 CFR 1506(2)(d). 1000 Friends recommends that the Administration correct this deficiency by issuing a supplemental DEIS addressing these impacts and containing one or more alternatives that would avoid the impacts and comply with applicable state laws.

1. The Requirement to Consider State Environmental Laws and Goals

23 CFR 771.105(b) provides:

“It is the policy of the [Federal Highway] Administration that...[a]lternative courses of action be evaluated and decisions be made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation; of the social, economic, and environmental impacts of the proposed transportation improvement; and of national, State, and local environmental protection goals.”

See also 40 CFR 1506(2)(d). As noted below, important provisions of Oregon and Washington state law directed at limiting global warming pollution are applicable to the CRC but are not addressed in the DEIS.

2. **Applicable Oregon and Washington Laws Require Sharp Reductions in Transportation Greenhouse Gases**

ORS 468A.205. provides:

- (1) The Legislative Assembly declares that it is the policy of this state to reduce greenhouse gas emissions in Oregon pursuant to the following greenhouse gas emissions reduction goals:
 - (a) By 2010, arrest the growth of Oregon's greenhouse gas emissions and begin to reduce greenhouse gas emissions.
 - (b) By 2020, achieve greenhouse gas levels that are 10 percent below 1990 levels.
 - (c) By 2050, achieve greenhouse gas levels that are at least 75 percent below 1990 levels.

The State of Washington has adopted similar greenhouse gas reduction requirements. Revised Code of Washington, Chapter 80.80.020. The 2008 Washington legislature went further and enacted targets for reductions in vehicle miles traveled as a specific strategy for reducing transportation-related greenhouse gas emissions:

To support the implementation of RCW 47.04.280 and 47.01.078(4), the department shall adopt broad statewide goals to reduce annual per capita vehicle miles traveled by 2050 consistent with the stated goals of executive order 07-02. Consistent with these goals, the department shall:

- (1) Establish the following benchmarks using a statewide baseline of seventy-five billion vehicle miles traveled less the vehicle miles traveled attributable to vehicles licensed under RCW 46.16.070 and weighing ten thousand pounds or more, which are exempt from this section:
 - (a) Decrease the annual per capita vehicle miles traveled by eighteen percent by 2020;
 - (b) Decrease the annual per capita vehicle miles traveled by thirty percent by 2035; and
 - (c) Decrease the annual per capita vehicle miles traveled by fifty percent by 2050

Engrossed Second Substitute House Bill 2815 (2008), section 8.

None of these Washington and Oregon state statutes is addressed or considered in the DEIS.

3. The CRC Will Induce Significant Increases in Transportation Greenhouse Gas Emissions, Violating Oregon and Washington State Laws

As we pointed out in our June 5, 2008 letter to the Metro Council (copy attached), the DEIS discloses that by 2030 the CRC 12-lane alternative will induce a 33 percent to 57 percent increase in daily vehicle travel across the Columbia in the I-5 corridor over the 2005 traffic level: 210,000 vehicle trips per day without tolling, or 178,000 trips per day if variable tolling is employed, compared to 134,000 trips per day in 2005. The alternative accomplishes this enormous increase in corridor traffic by providing approximately 14 lane-miles of added freeway capacity in the five-mile project area, so that 2030 northbound p.m. traffic is able to operate essentially free of congestion in the traffic model utilized by the project.

According to the DEIS, the average trip length for vehicles traveling through the project area in 2005 was 20 miles. There is no different estimate of average trip length for 2030 travel. It must be assumed that the 44,000 additional trips daily through the corridor made possible by the 12-lane alternative (with tolling and high-capacity transit) will also average 20 miles in length and thus will generate 880,000 additional vehicle miles per day (321 million per year) more than the level of travel in the region today.

At today's average vehicle fuel efficiency and fuel carbon content, those additional miles would add 321 million pounds of CO₂ per year to the atmosphere in 2030.¹ At *double* today's vehicle fuel efficiency (i.e., a 2030 car and light truck fleet that averages 40 miles per gallon equivalent), the 12-lane CRC would still generate over 160 million pounds (nearly 73,000 metric tons) of additional CO₂ emissions in 2030.

This is a giant step in the wrong direction under the global warming policies enacted by Oregon and Washington, and a facial violation of the requirements of Washington HB 2815. The Portland-Vancouver metropolitan area will need to find ways to reduce reliance on the automobile, and provide more transportation choices for its residents, in order to reduce GHG emissions from transportation as the region grows.

As we noted in our attached June 5, 2008 letter to the Metro Council, land use and transportation scenario planning should be an important step toward developing those choices. Increasing employment in Clark County, and reversing the growth in commuting from homes in Clark County to jobs in Oregon, can reduce automobile travel rather than increase it. Similarly, improvements in land use plans on both sides of the Columbia to increase the percentage of new development in mixed-use, pedestrian friendly centers with high-quality transit service can also reduce metro-area residents' need to drive. Unfortunately, the CRC project has not been informed by such scenario planning, as was disclosed by the *Oregonian* (see "Columbia River Bridge Plans Ignore Effects of Growth," Sunday, June 22, 2008 *Oregonian*; copy attached).

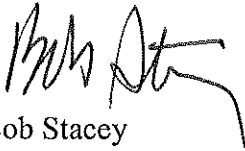
¹ The generally accepted rule of thumb, given the average fuel economy of the private car and light truck fleet, is that the equivalent of a pound of carbon dioxide is emitted for every mile driven. See, e.g., <http://www.travelmatters.org/calculator/transit/methodology>.

4. Recommended Action

We repeat the advice we gave the Metro Council on June 5, 2008. This DEIS should be supplemented by analysis of alternative land use and transportation scenarios aimed at producing a set of land use changes, transportation investments, and transportation demand management systems that will enable the Vancouver-Portland metropolitan area to achieve the greenhouse gas reduction targets enacted by the two states' legislatures. The Federal Highway Administration should then issue an SDEIS containing one or more alternatives for the CRC that accomplish the greenhouse gas emission reductions required by state laws and do not increase traffic capacity.

Thank you for your consideration of these comments; please advise me of your response to them.

Very truly yours,



Bob Stacey
Executive Director

Attachments:

Letter to Metro Council, June 5, 2008
Oregonian article, June 22, 2008



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June 5, 2008

Metro Council President David Bragdon
and Members of the Council
600 NE Grand Avenue
Portland, Oregon 97232

Dear President Bragdon and Members of the Council:

1000 Friends of Oregon is a signatory to the "Climate Smart Columbia River Crossing" Resolution developed by the Coalition for a Livable Future. We have limited our review of the CRC proposal to its effects on this region's global warming pollution, and express no judgment on the many other aspects of the proposed project or the many other issues thoughtfully raised by the various resolutions under consideration by the Metro Council today.

We are grateful for the careful study and deliberations of the CRC project steering committee and their several predecessor committees, whose members have worked diligently over the past decade to identify solutions to the demands for improved passenger and goods movement in the I-5 corridor. The proposal they have produced has received justified praise for its creative combination of elements – a light rail project, a safer and sounder highway bridge, improved pedestrian and bicycle facilities, and a tolling program designed both to manage congestion and help fund the project.

However, there is a fundamental test the proposal has failed to meet – a test that its planners and designers could not have been expected to anticipate only a few years ago, much less during the decade that the project has been in development. That is the requirement, enacted in 2007 by both the Oregon and Washington legislatures, that the two states in our region dramatically reduce greenhouse gas emissions (GHG). The Oregon standard, contained in 2007 HB 3543, directs that we *halt* the increase in GHGs within the next two years; that we cut emissions to 10 percent below 1990 levels by 2020; and that Oregonians reach a level 75 percent below 1990 emissions by 2050.

The targets apply to all sources, including the 38% of Oregon GHGs that are emitted by the transportation sector. If we are to achieve the targets, they must be applied by all levels of government to all significant decisions. They certainly must be applied to a \$4 billion transportation investment that will not be completed in less than a decade and that should endure for at least a century.

Transportation GHGs can be reduced in three ways. Vehicles can get better mileage; the carbon content of vehicle fuels can be reduced; and vehicles can travel fewer miles. In the past year or two it has become axiomatic that all three approaches will be needed. See, generally, Ewing et al, *Growing Cooler: The Evidence on Urban Development and Climate Change*, Urban Land Institute, 2008.

Many have believed that the third leg of this stool – less driving – will only require that we not *increase* growth in vehicle miles as much as we have in the past. Fewer vehicle miles per person, certainly; but in a growing economy with a growing population, many have assumed there still would be overall growth in traffic.

The analysis of transportation experts does not support that view. Last month the influential American Association of State Highway and Transportation Officials (AASHTO) released its *Primer on Transportation and Climate Change*, describing the state of research on greenhouse gases in the transportation sector and a range of scenarios for reducing transportation GHGs. The report is available at <http://downloads.transportation.org/ClimateChange.pdf>

AASHTO studied four scenarios for reducing GHGs, with the goal being the generally accepted target level of 80 percent below current levels by 2050 (roughly equivalent to Oregon's target of 75 percent below 1990 levels). In all the scenarios, AASHTO assumed continued growth in vehicle miles traveled (VMT), although at slower levels than the 2.2 percent annual average nationally from 1990 to 2005. In its most aggressive scenario it assumed that VMT will increase at only one percent per year (less than half the recent rate) and that the nation's cars and trucks will achieve an average vehicle fuel efficiency of *100 miles per gallon* equivalent. This scenario yields a GHG reduction to 68 percent below 2005 levels, well short of the 80 percent target.

AASHTO believes it is "plausible" that America's cars and light trucks will *average* 100 mpg by 2050 "if significant investments are made in improving technology." *Primer*, p. 30-31. Others are less confident; and the federal government recently blocked Oregon's and other states' efforts to implement California's proposal to require 43 miles per gallon in new cars by 2016. In any event, it is apparent that there is no room for continued growth in VMT if we are to achieve our 2050 target.

The evidence is clear. It is time to start planning for continued economic and population growth *without* growth in vehicle traffic.

The traffic models used for the CRC make the opposite assumption: that continued regional growth will result in strong growth in daily traffic demand at the Columbia crossing on I-5 - from 134,000 in 2005 to 210,000 by 2030, a 57% cumulative increase. DEIS, *Traffic Technical Report*, Exhibit 4-31 (Replacement Bridge option, without tolling). The CRC proposal would mitigate that increase through tolling and the provision of high capacity transit, reducing the projected trips across the proposed replacement bridge to "only" 178,000, an increase of 33% over today's traffic. *Id.* As a consequence, the DEIS estimates that GHG emissions from cars and trucks crossing the

bridge in 2030 will actually *increase* over today's levels — a result that is not permissible under Oregon's greenhouse gas reduction laws. DEIS, *Energy Technical Report*, pp. 5-3, 5-4.

On its face, the DEIS now under review makes it impossible for the Council to approve any of the alternatives offered when the choice of a Locally Preferred Alternative comes before you later this year. Additional work will be required to produce an alternative that does not increase regional VMT or exceed GHG reduction targets.

We have the following recommendations:

1. Metro should ask the CRC project to participate in the modeling work that Metro will undertake this summer and fall to test various regional transportation and land use scenarios as part of the 2035 Regional Transportation Plan Update. Those scenarios — if they include land use and transportation data for Clark County as well as the Oregon portion of the region — will enable the Council and its CRC partners to select a growth scenario (land uses plus transportation investments) that will achieve the 2020 GHG reduction target and will put the region on a path to achieve the steeper reductions required by 2050.

Changes in land use assumptions on both sides of the river, robust investment in local street systems and transit, and use of travel demand management techniques (presumably including the tolling proposed for the CRC) can produce scenarios that accommodate population growth without a growth in car and light truck traffic in the I-5 and other corridors. The scenario planning process can also identify whether there are other areas in which VMT reductions are more readily achievable, allowing trade-offs at the regional level. Only in this regional context could modest increases in VMT in this corridor be accommodated. Unfortunately, no such analysis has been performed by the CRC team; the CRC project should underwrite the costs of additional modeling Metro may need to do to assist project planning.

2. Metro should insist that the CRC include a “build” alternative that does not increase highway capacity. The “replacement bridge” alternative is not simply “three through lanes” with intermittent auxiliary lanes. Instead, it includes four continuous lanes in each direction from Victory Boulevard in Oregon to the project's northern end at the Main Street exit in Vancouver, a distance of about four miles in each direction. Additional auxiliary lanes, each extending more than a mile, bring the total additional throughput in the project area to about seven lane miles in each direction. (Fewer lane miles are added in the “supplemental bridge” option.)

It is this added capacity that works as an inducement to longer-distance through traffic and additional peak-hour interstate commuting—traffic growth that is not likely to fit in any GHG-constrained scenario. An alternative without these extended “auxiliary” lanes but including tolling and high capacity transit would permit more meaningful choices.

3. Metro and other CRC partners should defer selection of a “locally preferred alternative” until the work needed to comply with global warming emissions reductions, described in points 1 and 2 above, is completed.

The I-5 corridor is critically important to this metropolitan area and the economies of both states. In particular, the movement of goods is a high priority and is adversely affected by existing congestion on this facility. The CRC proposal includes important steps toward facilitating priority travel on I-5, including investment in high capacity transit and the use of advanced travel demand strategies including tolling.

However, assuming travel demand increases based on past trends in an era of rising fuel costs, falling VMT, and urgent greenhouse gas limits — and building significant new roadway capacity to “accommodate” that presumed growth in traffic — takes the CRC in the wrong direction. Metro, through its participation on the CRC Steering Committee, should insist on a project that furthers, rather than frustrates, Oregon’s and Washington’s greenhouse gas reduction policies.

Very truly yours,



Bob Stacey
Executive Director

cc: Gail Achterman, Chair, Oregon Transportation Commission
Matthew Garrett, Director, Oregon Department of Transportation
Mayor Tom Potter and City Council Members, City of Portland
Mayor Royce Pollard, City of Vancouver
Don Hanson, Chair, Portland Planning Commission

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The Oregonian

Columbia River bridge plans ignore effects of growth,

Designers decide not to factor in the extra sprawl, leading to traffic and pollution, that a bigger I-5 span might bring

Sunday, June 22, 2008

DYLAN RIVERA

The Oregonian Staff

FACTBOX

• Bridge vote

In planning a new, higher-capacity I-5 bridge over the Columbia River, the Oregon and Washington transportation departments ignored the potential for growth in North Portland and southwest Washington that could bring about yet more traffic and pollution.

The Columbia River Crossing, as the bridge project is known, is designed to relieve congestion on the six-lane bridge that now frustrates Oregonians, commuters from Vancouver, and round-the-clock truckers struggling to keep their schedules.

But a paradox lies ahead: If a bigger bridge with more lanes is built, will it create demand for housing and jobs, and yet more congestion? And will the boosted congestion spew more greenhouse gas?

Transportation authorities say it could.

The Oregonian has learned that traffic forecasters involved in planning a new bridge, projected to cost \$4.2 billion, were told to assume a new 12-lane bridge would not trigger any more growth than if the current bridge were simply left in place. Yet a 12-lane bridge would handle 40 percent more cars during afternoon rush hour, according to the forecasters' calculations.

Ignored is a finding by regional planners, in 2001, that eliminating the bridge's bottleneck threatened to push job and housing growth away from other parts of the metropolitan area and concentrate them in North Portland and across the river, in a rapidly expanding Clark County.

That might or might not be a good thing. But it is absent from decision-making on a project that could, according to several planning experts, influence growth and quality of life in a region that prides itself on avoiding sprawl.

The bridge plan isn't decided yet. A vote Tuesday by a 39-member bistate panel will establish the preferred bridge solution from among five alternatives. In coming weeks, the Portland and Vancouver city councils and other local agencies will follow with their own votes. But leading among the alternatives is a new, 12-lane toll bridge with a light-rail line attached.

In that scenario, it is likely that congestion and pollution will be higher than bridge planners have forecast. And the higher-capacity bridge could move the I-5 bottleneck southward, closer to central Portland, where the freeway is chronically congested.

Here's how we got here:

In making their designs, bridge planners had assistance from specialists with the Metro regional government. Though Metro is nationally known for using sophisticated computer tools to study sprawl and the role of highways in it, Metro's modeling staff heeded requests by Columbia River Crossing staff to assume that all bridge solutions would have no influence on development patterns in North Portland and southwest Washington.

They did so, according to Metro's chief traffic forecaster, to be free of the complex forces driving growth as they designed the five bridge scenarios.

"Essentially that was a simplifying assumption to assess what the difference might be between the infrastructure changes," said Richard Walker, travel forecasting manager for Metro.

Metro Councilor Rex Burkholder, who represents North and Northeast Portland, defended the approach, saying it would allow a better comparison among the bridge alternatives.

"If you let land use change as part of that, then you're not going to be able to compare those alternatives on a fair basis," Burkholder said.

But simplifying assumptions are "exactly what modeling is not supposed to do," said Todd Litman, of the Victoria Transport Policy Institute in Canada, also cited in Columbia River Crossing's own environmental impact statement. "Modeling allows you to do more detailed, case-appropriate analysis."

Other experts agreed.

Not taking growth into account is "flat out wrong," said Reid Ewing, a research professor at the National Center for Smart Growth at the University of Maryland, also a recent guest speaker and adviser to Metro on global warming issues.

Widening a highway on the northern part of the metro area would make it easier for residents to commute to downtown Portland from there than from other directions, Ewing said. So they're more likely to move there, which fills the expanded highway with more traffic.

"People can drive from subdivisions that are miles away from the facility and then to other employment sites or destinations," Ewing said. "Ripple effects go out quite a distance from the facilities themselves. Five miles would be a timid estimate of how far out those effects are."

Burkholder stands his ground. Tolls on the bridge would limit potential growth in the corridor, Burkholder said. And land-use regulations that limit sprawl can compensate for the easier travel a new bridge will allow, he said.

"Nothing we do transportationwise will solve our land-use problems," he said. "It takes political will to make it function."

Burkholder also said agency planners told him that a new bridge would boost growth in outer Clark County and also in downtown Vancouver, a scenario that Vancouver and Oregon leaders promote as an antidote to sprawl.

Yet when it comes to fighting sprawl with land-use rules, Burkholder said, Washington state is "10 years behind" Portland's Metro, but improving.

Change the traffic and growth assumptions, and the project's air quality assumptions should also change, Ewing said. That's because more traffic will add to pollution and greenhouse gas emissions, he said -- despite Columbia River Crossing's claims that newer vehicles running at higher speeds, even in greater number, would produce less.

The 2001 report on the I-5 corridor, issued by a panel of Oregon and Washington representatives, warned that widening the highway and adding light rail could increase demand for housing in Clark County at the expense of other parts of the region.

"Additional housing demand will increase the political pressure to disproportionately expand the Clark County urban growth area along the I-5 corridor to the north," the report says. "The greater the travel time savings relative to other corridors, the larger the redistribution."

And it examines the relationship of other traffic problems in the region to I-5: If Oregon 217 in Beaverton is not widened and the Sunrise Corridor in Clackamas County isn't built, "then the effect of the capacity increases in the I-5 corridor would be greater," the report states.

The warnings are found in the Findings and Policy Recommendations report of the land-use committee of the Portland/Vancouver I-5 Transportation and Trade Partnership.

The Oregonian sought a copy of the report from the Metro regional government but was told by a Metro spokesperson the report "did not exist," and, later, that only a two-page summary existed. The Oregonian obtained the full report from Columbia River Crossing staff.

Growth implications of the project can be consequential.

In cases from Chicago to Vermont, environmental groups have obtained federal court orders that required highway planners to redo their traffic forecasts to account for induced development, Ewing said. Such

litigation and new study can cause years of delay.

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oregonlive.com/environment

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