



From: [Jeremiah Baumann](#)
To: [Columbia River Crossing; Draft EIS Feedback;](#)
CC: ["Mara Gross"; Fuglister, Jill; Bob Stacey; ronb@donavoncards.com; FredTrain@aol.com;](#)
Subject: Environment Oregon comments on CRC DEIS
Date: Tuesday, July 01, 2008 3:01:20 PM
Attachments: [EOComments.CRCDEIS.7-1-08.pdf](#)

Please find attached, and pasted below, comments by the Environment Oregon Research and Policy Center on the DEIS for the Columbia River Crossing Project.

Comments on the Columbia River Crossing Project

Draft Environmental Impact Statement

Date: June 27, 2008

Global warming is the paramount environmental challenge of our time. Reducing global warming pollution has been a priority of the city of Portland since the early 1990s, and Portland has led the way, with green buildings, public transit and other strategies contributing to national and international recognition for achieving its first global warming pollution reduction targets. Environment Oregon's main focus in recent years has been on encouraging the entire state to follow the Portland metro area's lead and the state of Oregon, with global warming a top priority of Governor Kulongoski, is now a leader in its own right. Our Clean Cars program will require new cars to reduce emissions 30% by 2016 and our Renewable Energy Standard, one of the nation's strongest, will require Oregon utilities to generate 25% of our electricity from renewable energy by 2025.

It is fortunate that Portland and Oregon have done as much as we have to date, but these steps are just the beginning of what will be needed for our region to reduce global warming pollution by the amounts scientists have determined are necessary if we are to stabilize our climate and prevent the most catastrophic consequences of global warming.

Oregon's goals for reducing global warming pollution are intended to achieve these reductions: we need to reduce our pollution to 20% below 1990 levels by 2020 and 75% below 1990 levels by 2050.

We cannot afford any investment in a transportation project of this size unless it makes a

significant contribution to meeting these goals. A 12-lane replacement bridge, with or without transit and tolling, is not consistent with these goals. The Draft Environmental Impact Statement does not include sufficient analysis to recognize this conclusion, nor do any of the proposed options appropriately take global warming pollution reduction goals into account.

As context, transportation sources account for roughly 40% of Oregon’s global warming pollution—tied with electricity-generating power plants as our biggest source. To reduce global warming pollution from the transportation sector, we have to use each of three strategies:

- Making cars go farther on a gallon of fuel,
- Switching to cleaner fuels (such as electricity or sustainable biofuels), and
- Reducing our dependence on cars by reducing vehicle miles traveled.

Each of these strategies is critical, because each of them is necessary. According to an analysis by our organization, to reduce global warming 20% by 2020 nationally, if we achieved 40 miles per gallon by 2020 and reduced the carbon content of fuels by 10%, we would still need to stabilize vehicle-miles traveled at current levels. From a transportation planning perspective, reducing vehicle miles traveled is the primary strategy any major transportation project must focus on.

When it comes to reducing vehicle miles traveled in our region, the Columbia River Crossing project’s current alternatives are fundamentally unacceptable, because the project is planning for a future involving a 40% increase in vehicle traffic over the next 20 years, according to the “Purpose and Need” section of the Draft Environmental Impact Statement (DEIS).[1](#) It is simply not possible for this increase to happen and for our region to meet its global warming pollution reduction goals at the same time. The proposed project would be a \$4 billion plan to build for a future that we already know is not sustainable.

Of course, it is possible—in fact, it is entirely achievable—to spend \$4 billion changing this projected future and reducing our region’s dependence on the car. This would not only be a major step forward for the region’s efforts to address global warming; it would also be a true model for the nation to follow.

Unfortunately, none of these goals appear in the project’s statement of purpose and need.

The proposed alternatives do, of course, have some impact on this future. Backers of the Columbia River Crossing have noted, and rightly so, that this is the first major transportation project in the country to take global warming pollution into account and to include global warming analysis in its environmental analysis. They are also proposing public transit and tolling, two strategies that are critical tools for reducing vehicle miles traveled. These are the elements of the alternatives that should be preserved.

However, in the current proposals, public transit and tolling are used only as tools to mitigate what would otherwise be a project that causes a major increase in vehicle miles traveled. According to the DEIS, the combination of tolling and light rail would cut 47,000 vehicle trips from the projected increase, more than a 25% reduction in projected vehicle traffic. [\[2\]](#)

This alone would be a profound step in the right direction. Unfortunately, the added lanes (in the replacement bridge with light rail option) will erase most of this progress—it is well-established that added capacity increases traffic—by adding 41,000 vehicle trips, reducing the gain to just a 3% reduction in vehicle traffic over I-5. [\[3\]](#) Moreover, the project would cause a 1.4% increase in vehicle traffic on I-205, meaning the total impact on both bridges is a reduction in vehicle trips of a mere 0.76%. [\[4\]](#) None of the options considered include the most important option: investing in strategies to reduce vehicle miles traveled while avoiding options that induce demand.

For \$4 billion, Portland, a national leader in sustainable transportation systems, can certainly do better than a 0.76% improvement.

Even more troubling is the fact that according to the task force projections, the region as a whole would in fact see a slight *increase* in dependence on the car, from a 39.8% increase in regional vehicle miles traveled under the no-build scenario to a 39.9% increase under the proposal. [\[5\]](#) For \$4 billion, we certainly shouldn't be making things worse, even by this small margin. The Draft Environmental Impact Statement is flawed in not even assessing impact on total regional vehicle miles traveled, particularly when other CRC task force documents reveal that such analysis has been done.

It should be noted that the Columbia River Crossing could be an opportunity. The challenge of reducing our dependence on the car is the kind of sustainability challenge on which the Portland metro area thrives. In fact, we've already been reducing vehicle miles traveled in our region. A new Columbia River crossing could be a major investment in new transportation options and sustainability, a national model for how transportation planning should happen as we transition to a world of major cuts in global warming pollution. Unfortunately that opportunity is not among the options presented by the task force.

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<!--[if !supportFootnotes]-->[\[1\]](#)<!--[endif]--> *Interstate 5 Columbia River Crossing Project Draft Environmental Impact Statement and Draft Section 4(f) Evaluation*, Chapter 1, "Project Purpose and Need," May 2008.

<!--[if !supportFootnotes]-->[\[2\]](#)<!--[endif]--> *Interstate 5 Columbia River Crossing Project Draft Environmental Impact Statement and Draft Section 4(f) Evaluation*, Chapter 3, "Existing Conditions and Environmental Consequences," May 2008.

<!--[if !supportFootnotes]-->[\[3\]](#)<!--[endif]--> Ibid.

<!--[if !supportFootnotes]-->[\[4\]](#)<!--[endif]--> Ibid.

<!--[if !supportFootnotes]-->[\[5\]](#)<!--[endif]--> *Columbia River Crossing Task Force Questions & Answers*.
Downloaded from www.columbiarivercrossing.org June 5, 2008.

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Jeremiah Baumann
Environment Oregon
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Draft Environmental Impact Statement
Date: June 27, 2008**

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³ *Ibid.*

⁴ *Ibid.*

⁵ *Columbia River Crossing Task Force Questions & Answers*. Downloaded from www.columbiarivercrossing.org June 5, 2008.