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To: [Draft EIS Feedback;](#)
CC:
Subject: DRAFT EIS Feedback on 7/1/08
Date: Tuesday, July 01, 2008 9:43:49 PM
Attachments: [Memo to Sam Adams from Ron & Joe - Clark Co..doc](#)

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

Re: Columbia River Crossing DEIS

Dear Ms. Gunderson:

I submit the attached memo in Word for Windows, prepared for City Commissioner Sam Adams, at his request, by Joseph Cortright and myself, as my comments on the Columbia River Crossing draft environmental impact statement (DEIS). I request that this letter and the attached memorandum be made part of the record and responded to by the Federal Highway Administration in its final environmental impact statement for the CRC.

The attached memo details ways in which the DEIS fails to address important environmental impacts of the CRC as proposed, particularly the DEIS failure to project induced travel caused by the additional highway capacity to be created by the proposed project. I would like to recommend that the Administration correct this deficiency by issuing a supplemental DEIS addressing impacts of induced travel, and containing one or more alternatives that would avoid the induced travel impacts and thereby comply with applicable federal law.

Cordially,
Ronald A. Buel
2817 NE 19th Ave.
Portland, OR 97212

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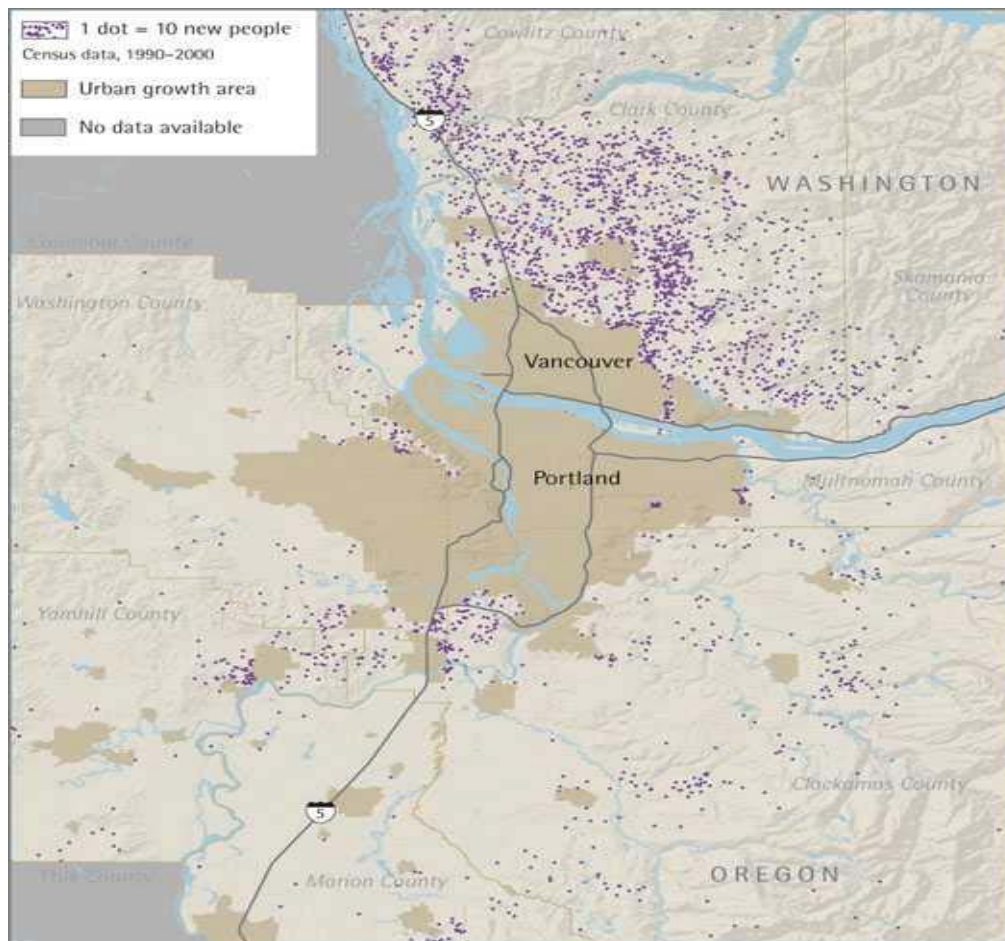
5/4/07

Memo to Sam Adams

From Ron Buel & Joe Cortright

Clark County Land-Use Analysis in reference to the Columbia River Crossing

There is no question that Clark County population has been growing steadily and rapidly through the year 2005, and has now reached 400,000 people. There is no question that Clark County has been sprawling out across the landscape – a look at this map with each pink dot representing 10 new people, from the Sightline Institute, for the period 1990-2000, shows the sprawl quite clearly:



Sightline
INSTITUTE

core
GIS

What is at issue, in terms of the planning for the Columbia River Crossing, is what will happen if there is a 12-lane bridge built, compared to what will happen if there is no change. To this end, the staff for the Columbia River Crossing Task Force has made some projections, and has presented them to the press and to the City Planning Commission and the City Sustainable Development Commission. We believe these projections are seriously flawed, and most particularly they are flawed as to what will

happen if we do not build six lanes of additional highway capacity throughout the bridge area to serve the 65,000 Clark County commuters and those who may join them between now and 2030.

As Dean Lookingbill of the Clark County Regional Transportation Council told us, the land-use projections for the 12 lane bridge and for the No Build Option in 2030 and 2035 are **the same**, as are the projections for population growth. This forecast, frozen for both cases by federal DEIS protocol, gives everyone seriously mistaken assumptions with which to work. Clearly, population in Clark County, which is projected to grow from 400,000 to 665,000 by 2030, and the continued sprawling pattern of that development, will be significantly altered with additional capacity for 40,000 trips a day at higher speeds across the new bridge, especially when compared to what will happen without that capacity and, therefore, *with* the resulting worsening congestion on the bridge.

What this faulty comparison of projected population and travel demand does is to ignore decisions that consumers make about where to live and where to work -- what is called "induced travel." There are, in effect, **no** projections in the CRC Task Force work for such travel that will come about because of the new bridge auto capacity. A direct historical analogy is useful, using the last time that freeway capacity was added across the Columbia. The Glenn Jackson Bridge, completed in 1982, had projections for 2000 and 2005 trips that were based on the same kind of analysis, no change in trip travel from the No Build Option to the new bridge. These trip projections, according to Lookingbill, were nearly **50% below** what actually happened in terms of bridge travel in 2000 and 2005. The lesson is simple – added highway capacity generates choices about where to live and where to work in a fashion that is *independent of* other trends.

Indeed, it is very likely that the businesses who wish to benefit from growing Clark County population recognize quite well what will be the impact of a new bridge – to spur housing development and population growth in sprawling Clark County. And, the governments there desire that the population does grow so that it can pay sales taxes, the source of most government funding in Washington. As you are well aware, the State of Washington does not have strong land-use laws protecting farm and forest land. So nearly all of the cities in Clark County have hundreds of acres of land that can be developed for housing, as shown in the chart below:

City Housing Acres Now Available for Housing in City In UGA outside City

Battle Ground	447.9	427.7	767.2
Camas	384.1	539.8	469.0
La Center	167.2	67.1	369.7
Ridgefield	451.2	568.9	609.0
Three Creeks	805.4	0	2,116.9
Vancouver	858.7	747.8	1,513.0
Washougal	207.7	295.9	248.9
Yacolt	14.8	33.5	5.1
Total	3,337.0	2,680.7	6,098.8

The CRC's own analysis shows that 93% of the additional travel over the replacement bridge will come from low density development in what they call "suburban fringe" areas of Clark County Source: (CRC: 2030 Transit Travel Markets Technical Memo, 2007). This low density fringe development will generate additional single occupancy vehicle travel and be particularly difficult to serve with transit.

Perhaps even more important to the decision about the Columbia River Crossing is what we believe to be a **purposeful miscalculation** about travel demand on the existing bridge if the additional highway-auto capacity is *not* built. Keeping with what is widely recognized as a bias of such highway department projections (Government Accountability Office (2005). Highway and Transit Investments: Options for Improving Information on Projects' Benefits and Cost and Increasing Accountability for Results, Washington, DC GAO-05-172)

the traffic across the new bridge is projected to grow dramatically by 2030 with the No Build Option, by even more trips than would occur with the additional capacity on a new bridge after tolls and transit are added or imposed. There are a number of factors which are counter to this typical straight-line travel prediction, not the least of which is that the rush-hour congestion *itself* causes alternative decision-making by potential commuters – choices to take other routes, to car-pool, to live closer to the job, and to take existing transit or bicycle options. But, in this particular case, there are other important considerations which have not been properly built into the CRC Task Force Staff's No-Build Option projections.

- Traffic has been already been **declining** across the bridge over the last two years. Average daily traffic declined by 0.5% in 2006 and by an additional 1.2% in 2007.
- Gasoline prices are the part of car ownership that is most visible to most commuters. The CRC Task Force Staff projections for all alternatives are calibrated to a travel demand model based on the experience of the 1990s, when real gasoline prices were much lower, and were actually declining in inflation-adjusted terms. In effect, these models are based on behavior back when oil was less than \$30 per barrel. It is *currently* at \$113 a barrel, and the City's Peak Oil Task Force expects it to rise sharply from that figure as oil supplies begin to dwindle. Rising gasoline prices are likely to have a very large impact on demand for peak hour commuting from Clark County, and this fact is **not** part and parcel of the No Build projections. In part, the impact from gasoline prices will be higher than projected because Clark County trips to work are, on average, longer than those in the rest of the region, because of the sprawled-out land-use pattern in Clark County. Already, higher gasoline prices are reducing gasoline sales and vehicle miles traveled in the region, and the long term effect is expected to be several times larger. Attached to this memo are a map showing 2030 travel demand from each geographic segment of the county, and the numbers of persons projected to be living in those

geographic areas. These have been provided from the Clark County RTC as the land-use data for 2030 projections for the No Build Option and the Big Bridge. CRC Task Force Staff said repeatedly before the City Sustainable Development Commission that the Bridge project “promotes compact development.” A quick look at the 2030 projections for increased sprawl in Clark County, with the new bridge or without, demonstrates conclusively that such statements are **not true**.

- CRC Task Force staff has said in hearings that there is **no** calculation in the travel demand numbers for the impact of a carbon tax, or for a cap and trade policy and regime on oil. Yet, if the CRC Task Force assumption of 40% growth in regional VMT by 2030 actually begins to look like it will occur, surely Oregon and Washington will head in that policy direction in this region. After all, VMT is the largest source of greenhouse gas emissions in the region. Such policy change could have a major impact on travel demand across the Columbia.
- Economist Cortright has recently released a paper published by CEOs for Cities (Driven to the Brink, attached to this memo) that demonstrates that, nationwide, demand for suburban housing is down. “The collapse of America’s housing bubble -- and its reverberations in financial markets -- has obscured a tectonic shift in housing demand. Although housing prices are in decline almost everywhere, price declines are generally far more severe in far-flung suburbs and in metropolitan areas with weak close-in neighborhoods. The reason for this shift is rooted in the dramatic increase in gas prices over the past five years. Housing in cities and neighborhoods that require lengthy commutes and provide few transportation alternatives to the private vehicle are falling in value more precipitously than in more central, compact and accessible places,” he writes. This is particularly true, he says, when suburban housing is compared to housing prices in healthy inner core cities, such as that in Portland, where housing prices have remained stable despite the current credit crunch. Again, this data, if it is in response, at least in part, to rising gasoline prices, throws yet another cloud over projections of growing travel demand in the No Build that require us to spend \$4.2 million for a big new bridge.
- As Clark County Commissioner Steve Stuart pointed out at the Oregon Bus Project debate on March 25, Clark County has about 50% fewer jobs per capita than the rest of the region south of the Columbia. The CRC Task Force staff has projected dramatically increased employment in Clark County between now and 2030, a result, it has said, of the vast population increase expected. But Scott Bailey, Regional Economist for the Washington State Employment Security Department found something a little different when he spoke on April 17. The slides for his remarks are attached to this memo. Bailey projects 2030 population figures **below** 600,000, which is quite a bit different than the 665,000 figure used in the CRC presentations. Bailey also noted that Clark County housing permits are now the lowest they have been since 1987. There is another bit of information in Bailey’s presentation that can have a major impact on

travel demand for commuting across the Columbia. The 185,061 persons in 2005 holding non-farm jobs and who are not self-employed, are largely aging baby-boomers and will be retiring at increasing rates. Retirement will leave thousands of jobs open in Clark County, and a fair number of those jobs are likely to be taken by the 65,000 persons who the CRC Task Force staff says are now commuting to jobs across the Columbia daily, thereby reducing further the travel demand projected in the No Build Option. Relatively minor adjustments in the projected growth rates of employment and housing in Clark County over the next 20 years would eliminate the enormous projected demand in commuting to Oregon, and the supposed need for additional transportation capacity.

We are not surprised that the CRC Task Force staff has significantly over-estimated demand for travel across the current bridge in a No-Build Option. Nor are we surprised that the Task Force staff has significantly under-estimated the induced travel to be caused by a combination of Clark County land-use and the additional freeway capacity built in the bridge area. We are, however, concerned that City Commissioners will buy their analysis.

We also feel compelled to point out additional gaps in the CRC presentations that we can document for you at length, if you so desire:

1) The No Build Option has not been publicly fitted with tolls and high capacity transit, to see what would happen to demand and congestion without the big new bridge. At first, CRC members and staff said it was illegal to toll the existing structure. After being repeatedly corrected on this point, they now acknowledge it is legal to do so. Obviously the \$750,000,000 for the light rail transit, bicycle and pedestrian crossing could also be applied for to FTA without a big new bridge. It is just that the Washington and Clark County members of the Task Force are better poker players than those of us on the Oregon side of the River, and they have seen that such alternatives are not presented. Nor is there an alternative presented for an arterial bridge connecting the two Ports for freight. Under the CRC analysis, the only reason that the Replacement Bridge alternative has less traffic (and therefore lower greenhouse gas emissions) than the No-Build is that it has tolls, and the No-Build does not: imposing tolls on the No-Build would result in less congestion and less greenhouse gas emissions at far lower cost.

2) The CRC Task Force staff has claimed before the City Planning Commission and the City Sustainable Development Commission that the congestion now found in the bridge area will not simply move to another area, such as the intersection of I-5 and the Banfield in the Rose Garden area, or to the areas where the traffic narrows from five lanes in the bridge area to three lanes on leaving the bridge area, going both North or South. Claims to eliminate or greatly reduce congestion on the I-5 corridor by virtue of the Big New Bridge are **not credible**, because over-all traffic and VMT in the region is increased, a fact one can ascertain by looking at the CRC's own projections. As a result, the congestion just moves to another part of the system – this is a law of cueing theory, and is not disputed by reputable analysts and scientists.

3) Similarly, the claim of the CRC Task Force staff to reduce air pollution and greenhouse gas emissions by adding capacity to speed up traffic through the bridge chokepoint area has **fatal flaws**. It, too, ignores cueing theory and second-level effects of added capacity, which again are scientifically proven to occur within a regional highway system when major capacity is added. Induced land use changes will produce longer commutes, more vehicle miles of travel and higher greenhouse gas emissions—all effects ignored in the CRC modeling.

4) We are also greatly concerned at the tendency of the CRC Task Force staff to over-exaggerate the impact of a single light rail line to downtown Vancouver, if it is to be built with approval of Clark County and Vancouver. In cities throughout the world, it has become quite clear that transit works best when it provides a truly competitive alternative to the automobile, and when a line within a single corridor such as I-5 becomes part of a much larger transit system that competes with the automobile. Yes, we agree that transit generally “promotes compact development.” But, how well it works to achieve compact development depends on how well, for example, C-Tran co-ordinates buses with the light rail stop, with how much time is saved on transit going to desirable job locations in Oregon compared to using an automobile, with how well the transit network gets you to varying locations outside the central city in Portland. And transit promotes compact development most effectively when the region doesn’t make a massive additional investment in building additional capacity for moving single occupancy vehicles. It is possible to show you numerous light rail stops in East Multnomah County, and in Washington County, that have little or no “transit-oriented development” as the Task Force staff gladly projects for downtown Vancouver and for the Hayden Island stops for light rail. Park and Ride lots in Downtown Vancouver that connect via freeway to sprawled out living locations throughout Clark County may not promote compact development at all.

5) The claims of freight growth via trucking in the region are also highly questionable. So, too, are the claims of the importance of freight to our economy. Freight movement is not a major factor in the Portland area’s economic competitiveness, and marginal improvements (or declines) in travel times within the metropolitan area will have no measureable effect on long term regional economic growth. Freight intensive industries are in decline, and growing industries move trivial amounts of freight. Freight companies already route around congestion—truck movements over the I-5 bridge are lowest in the peak hours, and 85 to 90% of all freight in the corridor moves at non-peak hours or in the non-peak direction. Higher fuel costs are affecting freight growth: truck freight per unit of GDP is declining sharply, and intermodal rail freight movements are up sharply. Most truck freight in the region is low value (fuel, gravel, logs), and moves short distances (less than 50 miles).