

From: [Olson, Carolyn](#)
To: [Draft EIS Feedback;](#)
CC: [Wetzel, Alice Ann; Gillam, John;](#)
Subject: CRC Draft EIS Comments attached
Date: Tuesday, July 01, 2008 4:42:43 PM
Attachments: [1883_001.pdf](#)
[1884_001.pdf](#)
[1885_001.pdf](#)
[1886_001.pdf](#)

Attached are the transmittal letter and three comment documents from the City of Portland Bureau of Planning and the City of Portland Planning Commission.

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**Colmbia River Crossing
Planning Commission Questions for EIS
July 1, 2008** 

How will the project be financed?

- Assumptions made in the DEIS are gas tax and tolling revenues are inelastic to gas price increases and the direct relationship of VMT. If gas prices create an elastic model of VMT reductions when gas prices rise, how is the total funding impacted?

For funding coming from Oregon, what is the split of local, state, and other funding? And what are the assumptions for the split?

For Oregon funding from gas taxes, will this decrease Portland's share of available gas tax?

What risk analysis has been done for the project? What if tolls are reduced because of decisions to drive less?

How likely is Washington State monies, given the current demand for these funds?

What are the opportunity costs of the local match (\$600 million) for the City of Portland and the region?

What other local/state projects are competing for the same federal transportation funds?

Are other critical projects in jeopardy of not being funded? How do statewide taxpayers benefit?

Will tolling be a permanent funding mechanism?

What will be the equity effects of the tolling system?

How does this project support a regional urban form that emphasizes compact, walkable mixed-use centers and neighborhoods connected by transit (in Portland and in Clark County), as well as other housing choices?

Will the project itself induce significant new automobile demand?

Will the project induce significant new housing demand in Clark County?
How has this been taken into account in the forecasting?

Could increased housing demand in Clark County eliminate congestion enhancements brought by increased bridge capacity?

How does this project help reduce our carbon footprint (e.g., reduce greenhouse gas emissions)? How has carbon footprint analysis been factored into the analysis and design of the project?

Does this project promote economic vitality in Portland?

Does it help solve freight mobility issues over the long-term?

How does the project solve freight mobility issues between Wilsonville and Clark County? What is the impact of the project on I-5 traffic at the Rose Quarter?

How does this project affect public safety and livability?

How sustainable is the project? What is the most efficient (in terms of the multiple objectives being considered) long-term solution to the identified problem?

What "green" elements have been incorporated into the project's design and construction?

How does this project shift modes of travel from auto dependency to other modes? Does it make the I-5 corridor plan work? How effective will it be at changing behaviors?

Does the project promote equity, particularly with respect to transportation, commuting, and housing patterns? How?

What is the project's impact on Hayden Island, Interstate Avenue, and other Portland corridors – both in terms of congestion and development potential?

How does this project improve our northern gateway to the City and State? Is the structure "iconic", reflecting its symbolic importance for both states?

How have the design constraints of Pearson airfield and the navigation channel been examined?

How could the design be different if Pearson's airfield was not a constraint? Could this design cost less than the current structure proposed? How does this affect aesthetics?

Stewardship: How will the issues raised at this stage of the process be managed throughout the next phases of the project?

The CRC staff should provide:

- Independent analysis of greenhouse gas emissions/assumptions
- Detailed financial plan
- Risk analysis

Why is a regional TDM strategy not included as part of this huge investment?

Why was a local option bridge not included as a potential LPA?

Large transportation infrastructure projects often spur increased development nearby. How has the CRC analysis incorporated increased housing in Clark County into the analysis?

What strategies and efforts has the planning process developed for ensuring, demonstrating, and substantiating compliance with Title VI? What measures have been used to verify that the multi-modal system access and mobility performance improvements included in the CRC project, and the underlying planning process, comply with Title VI?

Has the planning process developed a demographic profile of the metropolitan planning area that identifies the locations of socio-economic groups, including low-income and minority populations as covered by the Executive Order on Environmental Justice and Title VI provisions?

Does the planning process seek to identify the transportation needs of low-income and minority populations? Does the planning process seek to

utilize demographic travel information collected from current bridge crossings to examine the distributions across these groups of the benefits and burdens of the transportation investments included in the CRCDEIS plan? What methods are used to identify imbalances?

Does the planning process have an analytical process in place for assessing the regional benefits and burdens of transportation system investments for different socio-economic groups? Does it have a data collection process to support the analysis effort? Does this analytical process seek to assess the benefit and impact distributions of the investments included in the CRC plan?

How does the planning process respond to the analyses produced? What imbalances were identified? How are their concerns documented, and how do they reflect on the performance of the planning process in relation to Title VI requirements?

What mechanisms are in place to ensure that issues and concerns raised by low-income and minority populations are appropriately considered in the decision making process?

How will CRC proposed construction alter minority business districts within Portland, and visibility to traffic-based businesses? How will visibility and access changes alter business activity? What measures is CRC taking to mitigate impact to minority business districts?

The DEIS process has been crafted to meet federal standards outlined in the National Environmental Policy Act (NEPA) of 1969, which requires a DEIS to "promote efforts that will prevent or eliminate damage to the environment and biosphere, and stimulate the health and welfare of man." To satisfy NEPA requirements, the CRC project has focused on meeting minimum standards set by federal and state governments for air quality and noise. How will CRC exceed future air quality standard set forth by the State of Oregon?

The DEIS analysis of safety considers only the frequency of collisions. It shows that during the study period (2002–2006), the crash rates in the project area were twice the rate of average collisions on other urban interstate highways. While the frequency of crashes is expected to decline with the proposed bridge alternatives, the severity of the crashes may increase given the higher speeds of travel projected. What measure is CRC taking to decrease or mitigate the severity of future crashes on the new structure?

The Bridge Influence Area in Portland includes industrial and airport emissions in addition to pollution from mobile sources. Bridge alternatives

that raise cumulative ambient levels of air toxics will increase the risks posed to human health. Considering the impacts of the CRC project in isolation does not take into account the contribution the project makes to the overall levels of air toxics already present. How are the impacts taking into account the cumulative ambient level of air toxics?

The FHWA noise abatement criteria require mitigation for highway project noise impacts that exceed 67 dBA in sensitive areas outdoors (residences, parks, and schools) and 72 dBA for developed areas, such as commercial centers. According to the DEIS there are 234 locations in the CRC study area that exceed acceptable noise thresholds. With the "no build" alternative, this increases to 268. With the "build" alternatives, this increases to 329-334 without mitigation. With the inclusion of sound walls and residential improvements, the "build" alternatives potentially reduce the unacceptable noise impacts to 52 locations. What are the mitigation measures to bring the CRC project in compliance with Federal standards?

The assumed cost of auto transit is substantially lower than reality suggests. What costs are included in the "auto operating cost" per mile and how much are each of these costs assumed to be? While it may be speculative to assume that VMT will decrease as gas prices increase, it is clear that fuel prices are rising faster than inflation. What risk analysis which factors in rising fuel prices, lower VMT, carbon taxes, has been done to justify a \$4.2 billion investment?

CITY OF PORTLAND, OREGON

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June 24, 2008

Mayor Potter and Members of Portland City Council
Portland City Hall
1221 SW Fourth Avenue
Portland, OR 97204

Dear Mayor Potter and Members of Portland City Council:

On behalf of the Portland Planning Commission, thank you for the opportunity to share our recommendations with you as you consider moving forward with the proposed Columbia River Crossing (CRC) preferred alternative.

The Planning Commission heard briefings in earlier stages of CRC planning several times during 2006 and early 2007. More recently, we were briefed on CRC alternatives March 11, 2008 and April 8, 2008. A public hearing was held before the Planning Commission on May 13, 2008, and we subsequently received additional written testimony.

In evaluating the proposed CRC alternatives, we have considered the project from both a City and a regional perspective. We have based our evaluation and conclusions upon public testimony, our questions, subsequent answers from the CRC team, and our discussion.

As it has been presented to the Planning Commission, the question that City Council will vote on is whether to approve a replacement bridge with light rail and tolls as the locally preferred alternative. Our understanding is that all other decisions about the design and size of the bridge remain on the table.

Based on the information and testimony we have received, we believe that a replacement bridge will best meet the safety, seismic, and congestion mitigation and freight movement goals for the Bridge Impact Area. However, we have serious concerns about the bridge design we have seen to date, and how it would impact the Portland metro area.

Below we have outlined our considerations and concerns. Additionally, we have included Attachment A that modifies a PDOT staff recommendation and constitutes, along with this letter, a detailed Planning Commission's recommendation to you.



Essential elements of a new bridge

The Planning Commission believes that any replacement bridge should meet the following criteria:

- A. It should include light rail.
- B. It should be conditioned on permanent tolling to minimize “induced demand” and sprawl, and to maximize freight mobility.
- C. It should be a fiscally responsible project that provides the lowest possible risk to the city and region - both in regard to actual bridge financing and to its “opportunity cost” impact on transportation projects over the next 30 years.
- D. It should be beautiful, with superior quality design appropriate for a gateway to Oregon and Washington.
- E. It should provide a comprehensive, long-term solution to freight movement as opposed to a temporary solution based on providing more capacity in the shorter term. That solution should include simultaneous improvements to the rail freight infrastructure in the region, as outlined in the I-5 Transportation and Trade Partnership *I-5 Rail Capacity Study*. This could include improvements to the railroad bridge over the Columbia west of the proposed new bridge site. A comprehensive solution should also consider HOV lanes that convert to freight-only lanes during non-peak hours.
- F. It should include “world class” bicycle and pedestrian facilities that meet or exceed standards set by other projects in the Portland metro area and elsewhere.
- G. In addition to addressing the localized emissions resulting from traffic congestion, any new bridge should help Oregon achieve our stated greenhouse gas reduction goals by also reducing Vehicle Miles Traveled (VMT) in the region. The project must be more than a congestion management tool for the five miles of the Bridge Influence Area. To that end, a comprehensive Transportation Demand Management plan should be developed to manage sprawl and shift trips to transit.
- H. It should comprehensively address the health of the surrounding community, and equity issues associated with low-income and minority populations in the city and the region.



The Planning Commission is concerned that the proposed preferred alternative, as currently configured, does not meet the goals articulated above. Our concerns have sharpened in light of warning signals raised by public testimony, community partners, testimony of the CRC staff, and other regional advisory and governing bodies.

Those warning signs include the following convergence of factors:

1. Climate change has emerged as a critical issue for Oregon and the City of Portland.

The state of Oregon has adopted the goal of a 75% reduction in greenhouse gas emissions below 1990 levels by 2050. Achieving that goal in the transportation sector will require a significant reduction in VMT. While the CRC preferred alternative does address VMT through tolling and light rail, the massive size and capacity increase of the highway bridge reduces the potential transit mode split as it seeks to accommodate an assumed 33% VMT increase (Traffic Technical Report, Exhibit 4-31 Replacement Bridge Option with Tolling).

As stated by the Portland Sustainable Development Commission in their June 2 letter to you,

"[T]he City and County are currently updating their joint climate-protection plan, and the initial analysis shows that the region must reduce vehicle miles per day to less than half of 2006 levels by 2050. We are concerned that such an extensive project as the CRC preferred alternative may not help us to achieve that goal, and may, in fact, increase our emissions overall despite the proposed provision of enhanced bike, pedestrian and transit features." (Letter from Portland Sustainable Development Commission to Portland City Council; June 2, 2008).

2. Oil and fuel prices are rising steeply, resulting in a significant potential change in driving behavior.

The 2005 assumptions upon which CRC demand projections were based include oil and gas price projections for 2030 that have already been exceeded – in some cases more than doubled – in today's market. While fuel prices are only one factor in predicting travel demand, the scale of this increase has already changed driving behavior in the short term.

Again in their June 2 letter, the Sustainable Development Commission offered the following caution:



"[W]e are concerned that the data underpinning the CRC preferred alternative may be outdated or flawed... We believe fundamental changes in behavior are occurring over a relatively short period of time because citizens are reacting to both high gas prices as well as a general increase in awareness of climate change. For example, bridge traffic over the Columbia River has decreased by at least 3 percent since February 2008. In addition, gas consumption on a per capita basis has decreased to 1966 levels and vehicle miles traveled (VMT) in Oregon are down, while transit use has increased." (Letter from Portland Sustainable Development Commission to Portland City Council; June 2, 2008).

In the face of these factors, the Planning Commission believes it would be imprudent not to consider possible long-term changes in driver behavior as decisions about the size, cost, and design of the bridge are considered.

3. Steadily declining gas tax revenues have resulted in a serious and pervasive transportation funding shortfall at the state and city levels.

If the new bridge is to be funded in any part by statewide gas taxes, that funding presents several levels of risk – both to the project funding itself and to other as-yet-unfunded transportation priorities in the Portland region.

A gas tax-based project has particular financial risk and volatility. Any reduction in state gas tax revenues (based on improved technology or on driver response to rising fuel costs, or both) means the project could consume a greater percentage of a potential gas tax increase than anticipated. In turn, this could further reduce the already insufficient gas tax revenues available to the City of Portland to meet the growing backlog of transportation investment needs. Given the importance of the CRC to the state as a whole, we believe any Oregon gas tax funding for the project should come from the state's share of gas tax revenue.

As you know, the City of Portland and PDOT are already making changes to address these realities. In a recent statement, Mayor-elect Sam Adams pledged that the City, in order to deal with reduced transportation revenues and increasing fuel costs, will 1) *evaluate all capital projects to ensure recent price increases are included*; and 2) *examine opportunities to reduce fuel consumption*. We urge you to do the same for this project.



Planning Commission Recommendation

Understanding the risk inherent in these issues goes to the heart of our concern that we as a city and region build the *right* bridge. To this effect, the Planning Commission recommends that the City Council approve a replacement bridge – but *only* if items (A-H) above addressed.

To do this, we respectfully recommend that you do the following:

1. **As your colleagues at Metro did in Resolution 08-3938B and Exhibit A, condition your approval on the creation of an oversight committee that includes representatives of Portland, Vancouver, the Metro Council and R.T.C, and the affected transit agencies.**

Decisions should be unanimous and should include, but not be limited to: 1) the total number of lanes including “auxiliary” lanes; 2) the size and design of bike/pedestrian facilities; 3) light rail and station design; and 4) bridge design aesthetics worthy of its regional significance and gateway nature (which may include revisiting presumed design constraints).

A schedule and scope of work for the oversight committee should prioritize the following three activities so the results are available to help guide the actual bridge design:

- A. Hire an independent analyst to evaluate the financial risks of the project and incorporate the results of that audit to guide bridge design decisions move forward. Urgent consideration should be given to introducing tolls as a financing option as soon as legally permissible.
- B. Contract for an independent analysis of greenhouse gas emissions and induced automobile demand. This analysis should also consider the costs of a formal carbon market.
- C. Critically consider the design constraints of Pearson Airfield and the navigation channel beneath the railroad bridge to the West of the new bridge.

City Council should ensure that Portland’s representative to the oversight committee participate actively, with the goals of supporting the emerging vision of the Portland Plan and reducing financial risk to the City.

2. **Ensure that the ultimate design of a replacement bridge is a beautiful, “signature” gateway structure for Oregon and Washington. Reconsider the**



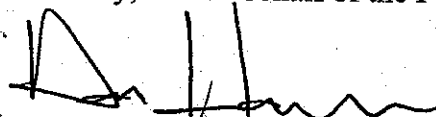
airfield and railroad bridge as constraints that compromise the ultimate design of the CRC

- 3. Insist that a new bridge project achieve the VMT reduction levels necessary to meet state climate change goals.**
- 4. Insist on a written (if draft) funding plan for the bridge, so the City and its citizens clearly understand the proposed sources of money for the project. State funds should not reduce Portland's allocation of local gas tax revenues.**
- 5. Insist that the next phase of the EIS process comprehensively address equity issues associated with low income and minority populations.**
- 6. Ensure that bridge construction address the highest achievable levels of sustainable design, including a comprehensive stormwater management strategy.**
- 7. Incorporate recommendations contained in the PDOT staff report (Attachment A), including further analysis of the interchanges at Hayden Island and Marine Drive. Ensure that local agencies have influence over interchange design.**

In closing, the Planning Commission commends the CRC team, with special thanks to PDOT and Bureau of Planning staff, for their long and difficult work on this project. We have taken seriously our responsibility to analyze potential impacts of the CRC on the city beyond those anticipated within the confines of the 5-mile project area. Our recommendations arise out of this responsibility.

Again, thank you for the opportunity to review this project.

Sincerely, and on behalf of the Portland Planning Commission,



Don Hanson, President
Portland Planning Commission



**City of Portland Recommendations on Columbia River Crossing
Locally Preferred Alternative (LPA)**

Locally Preferred Alternative Recommendations

- LPA 1. The Replacement Bridge is recommended as the river crossing component of the LPA.
- LPA 2. Light Rail Transit (LRT) is recommended as the high-capacity transit component of the LPA.
- LPA 3. Further technical analysis and public involvement is needed to determine the "appropriately sized" bridge for all multi-modal components.
- The City of Portland understands that the size bridge analyzed in the DEIS is a maximum-impact design for the purpose of NEPA and not a commitment on bridge size. The City of Portland recommends that the next phase focus on the smallest bridge possible to meet project needs.
- LPA 4. The highest quality architecture for the project allowable by engineering limitations/reasonable cost shall be employed for both the Columbia River span and the Portland Harbor span.
- Reconsider the constraints on bridge design related to navigation and airspace.
- LPA 5. The project shall include a "World-Class" facility for pedestrians and bicyclists crossing the Columbia River and throughout the project area.
- LPA 6. The CRC project shall provide the highest model of sustainability design and construction applications for a bridge of its proposed size and scale, including a comprehensive stormwater strategy.
- LPA 7. A comprehensive transportation demand management (TDM) strategy shall be developed including the use of variable-priced tolling in perpetuity.
- LPA 8. The CRC project should contribute to a reduction of vehicle miles traveled (VMT) per capita in the bi-state metropolitan area.
- LPA 9. The I-5 Columbia River Crossing project shall consider long-range plans for freight movement; both truck and rail, including improvements to the nearby rail bridge over the Columbia River and the connecting rail facilities in Vancouver and Portland.
- LPA 10. The CRC project shall develop a detailed financing plan showing costs and sources of revenue. The financing plan shall indicate how the use of the identified federal, state and local (if any) revenues would impact the financing of other potential transportation projects in the region. Any Oregon State gas tax revenues used to finance the CRC project shall come from the State's share of new gas tax revenues thereby not reducing the share of new gas tax revenues allocated to the counties and cities.
- LPA 11. The CRC project shall contract for an independent analysis of the greenhouse gas and induced automobile travel demand forecasts for the project.

Hayden Island Interchange Recommendations

- HI 1. The CRC project must provide an ultra high-quality LRT station on Hayden Island that provides a community focal point. Safe, attractive and accessible pedestrian and bicycle facilities shall be incorporated into the station area design.
- HI 2. CRC project arterial streets providing access to the interchange shall also serve community needs, and provide bicycle and pedestrian facilities and street trees. Smaller scale arterial streets than currently indicated in the DEIS should be considered.
- HI 3. The western termini of the CRC project arterial street improvements on Hayden Island Drive and Jantzen Beach Drive should be extended to the planned primary north-south future public street (approximately 600 feet west of the freeway ramp intersections).
- HI 4. The extension of Tomahawk Drive under the freeway shall be designed as a community main street highlighting the needs of pedestrians and bicyclists and local traffic access. Design issues to be resolved include the provision of acceptable vertical and horizontal clearances, property access, stormwater management and creating an attractive and safe environment under the freeway.
- HI 5. The CRC project should participate and allow for the re-use of areas north of Hayden Island Drive that are disrupted by construction or used for construction activities, for open space, stormwater management and habitat restoration.
- HI 6. The CRC project, ODOT and the City shall work cooperatively in the development and adoption of the required Interchange Area Management Plan (IAMP). The IAMP shall consider the principles of IAMP standards balanced with current and future property access and in coordination with a master street plan for Hayden Island.

Marine Drive Interchange Recommendations

- MD 1. The next phase of the CRC project development process should continue to evaluate the interchange design alternatives presented in the DEIS.
The evaluation should recognize that this is a freight priority interchange and also consider potential future land use opportunities, the current and future needs of Expo and the protection of the Vanport wetlands.
- MD 2. Implement a network of pedestrian and bicycle facilities to improve connectivity in the interchange area, and connecting to Bridgeton and to Hayden Island under all interchange design options.
- MD 3. The CRC project should include an extension of the pedestrian and bicycle facilities to Bridgeton including a first phase construction of the Bridgeton Trail.
- MD 4. Under all interchange design options the potential for a local street connection (non-freeway) to Kenton should be evaluated.

- MD 5. The CRC project, ODOT and the City shall work cooperatively in the development and adoption of the required Interchange Area Management Plan (IAMP).

Pedestrian Bicycle Facilities Recommendations

- PB 1. A multi-use facility should provide for three separated facilities and space dedicated for southbound bicycle travel, northbound bicycle travel, and pedestrians adjacent to the high-capacity transit facility. This facility should meet or exceed standards set by "World-Class" facilities.
- PB 2. Bicycle and pedestrian facilities on the river crossing bridges should provide for occasional rest areas and look out points.
- PB 3. The multi-use facility on the river crossing should be of continuous design and connect to the Hayden Island transit station and the EXPO station.
- PB 4. An urban standard pedestrian facility shall be provided on the east side of the Portland Harbor bridge connecting Bridgeton to Hayden Island.
- PB 5. Implement the pedestrian and bicycle improvements identified for the recommendations for the Hayden Island and Marine Drive interchanges.

Urban Design Recommendations

- UD 1. Engineering refinements for the bridges should be undertaken to produce a signature distinctive design given physical limitations and cost considerations.
- UD 2. An alternative reconfiguration of the Marine Drive interchange should be considered to strengthen the adjacent publicly-owned properties' relationship to the North Portland Harbor waterway and provide redevelopment opportunities.
- UD 3. The new Hayden Island interchange and transit station functions must be carefully integrated in design and be supportive of the Hayden Island Concept Plan recommendations.
- UD 4. Iconic design elements over North Portland Harbor could be analogous to those used at the future iconic Evergreen Street "lid" north of State Route 14 in Vancouver.

Environmental Justice Recommendations

- EJ 1. The CRC project shall assess the impact of tolls on low-income people, including toll avoidance and limited access to technology for payment of tolls.
- EJ 2. The CRC project should assess the impact of the project on low income and minority populations in the region regarding access to affordable housing and employment.
- EJ 3. The CRC project should address project impacts on populations at or below the poverty level.

Process Recommendations post LPA

PR 1. The City of Portland supports the formation of a Local Oversight Committee (LOC) consisting of the six local and regional project sponsors (City of Portland, City of Vancouver, Metro, RTC, TriMet and C-Tran) who shall participate with ODOT and WSDOT in major post-LPA decisions including:

- The size, location, design and aesthetics of the bridges and highway facility in the project area
- The size, design and location of the bicycle and pedestrian facilities in the project area
- The location and design of the light rail transit facility including stations

The decisions of the LOC shall be reached by consensus. The Portland City Council shall conduct public hearings on major post-LPA decisions.

ODOT and the City of Portland shall agree on the design of the Hayden Island and Marine Drive interchanges.

The LOC shall review and comment on post-LPA studies and plans, including:

- Reconsideration of bridge design constraints related to navigation and airspace (see LPA 4)
- CRC project finance plan (see LPA 10)
- An independent analysis of greenhouse gas and induced automobile travel demand forecasts (see LPA 11)

The City of Portland believes it essential that the financial, greenhouse gas and review of design constraints be immediate priorities of the Local Oversight Committee. The LOC will need the results of this analysis to adequately consider revisions to the project and insure that these revisions can be completed in a timely manner. The City of Portland recommends that this be considered in the decision, scope and schedule of work to be determined by the Governors and the LOC.

- PR 2. The existing advisory groups for freight, pedestrians/bicycles, urban design and environmental justice should continue their roles for post-LPA activities. The CRC project process should also consider assembling a combined design advisory group.
- PR 3. A process agreement should be established between the City and CRC project management to outline an on-going review, approval, and public hearing role for City Council for post-LPA activities.
- PR 4. The Bi-State Coordinating Committee should continue to review post-LPA project recommendations and comment at important milestones. This group should also consider updating their land use accord to assure a stronger role in land use/transportation coordination matters particularly for high-capacity transit planning between the states.