


**From:** [ArchitectureWeek Editors](#)   
**To:** [Draft EIS Feedback;](#)  
**CC:** [Artifice Staff;](#)  
**Subject:** Comment on Columbia River Crossing Draft EIS  
**Date:** Tuesday, July 01, 2008 6:21:50 PM  
**Attachments:**

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Re: CRC DEIS COMMENTS

To: Columbia River Crossing  
c/o Heather Gundersen  
700 Washington Street, Suite 300  
Vancouver, WA 98660

Dear CRC Team et al.,

Thank you for the opportunity to comment on the draft environmental impact statement for the Columbia River Crossing project (CRC DEIS). We are participating as the Editorial Board of ArchitectureWeek magazine, the premiere professional architecture and planning periodical based in Oregon.

We have reviewed this document, fully recognizing that our cities, state, region, nation, and indeed our planet are at a critical crossroads of change with regard to transportation planning. In one direction, the road continues the general tenor of analysis and hence the kind of conclusions seen in business as usual over the last half-century. In the other direction, the road to-date less traveled, lies the substantive response to the threat and reality of anthropogenic climate change.

We fear that the CRC DEIS lies in the main direction. In terms of analysis, because of the fatally-incomplete review of impacts due to induced traffic related to land use changes, the current work is inadequate to properly authorize such a significant project at this time (<http://www.oregonlive.com/news/oregonian/index.ssf?/base/news/1214029515244280.xml&coll=7>). In terms of conclusions, the expansive alternatives represent unacceptable misallocations of essential resources in a time of unfolding crisis in U.S. transportation.

The State of Oregon has adopted goals by legislation for reducing greenhouse gas emissions to 10% below 1990 levels by 2020, and to 75% below 1990 levels by 2050.

While the latest climate science suggests those goals are not stringent enough to prevent triggering disastrous climate switches, the adopted goals are sufficient for immediate planning purposes.

Transportation planning that projects to meet those adopted goals, as it is morally imperative that the CRC DEIS must, will need to show assurance of high levels of vehicle miles traveled (VMT) reduction over time.

In fact, simple calculations using stabilization wedges as well as other approaches show that to project transportation sector compliance with greenhouse gas emission reduction goals, using currently-demonstrable or reasonably-expected technologies, VMT reductions on the order of 50% are required over the next 20 years or so.

This reality has two profound implications, which are difficult to avoid:

- 1) The only new large transportation projects that can be considered acceptable at present are those that are aimed directly at reducing VMT. This implies, for instance, that 90% or more of transportation funding needs to be allocated to low-emissions public transit for people and rail for freight, rather than conventional over-the-road vehicle capacity building.
- 2) Projects that are proposed primarily for congestion-reduction and capacity building are literally pointless. When we make the correct alternative investments to reduce VMT, we will see continuing and increasing drops in highway traffic levels - as we have in fact started to see already in 2008 over 2007 under the influence of higher gas prices.

Conservatively, each extra lane-mile added to a congested highway will increase emissions of carbon-dioxide, the main greenhouse gas, by more than 100,000 tons over 50 years, even assuming major improvements in vehicle fuel efficiency, as shown by the Sightline Institute and others ([http://www.sightline.org/research/energy/res\\_pubs/climate-analysis-gge-new-lanes-10-07](http://www.sightline.org/research/energy/res_pubs/climate-analysis-gge-new-lanes-10-07), <http://www.smartgrowthamerica.org/gcindex.html>).

A sprawl-inducing bridge expansion would increase regional VMT, at a time when all significant transportation investments must be concentrated on safely and economically reducing VMT.

As part of an ongoing program of climate change research and communication, we have studied and published on these issues in ArchitectureWeek magazine. Some of our recent coverage includes:

New Urbanism in Charlotte

<http://www.ArchitectureWeek.com/2008/0409/index.html>

Tackling Climate Change

<http://www.architectureweek.com/2008/0423/index.html>

Climate Action Now

<http://www.architectureweek.com/2008/0430/index.html>

Reviewing the words we have written and conclusions we have reached ourselves in the national arena highlights some hard questions on this more local issue.

How much more public resource must Oregon devote to going down the wrong path, before we turn to the new path - as we know we must? Will Portland go down in history as spending billions on one of the last horrible dinosaurs of the backward, unsustainable 20th Century approach to highway planning? Or will we go down in history as one of the first regions to act in accord with our own knowledge and rhetoric, leading forward in this new millennium?

This is one dimension of the future for which the crystal ball is as easy to read as a mirror on the wall. We must stop now in building large new highway projects to support traffic increases that will not even be there - traffic increases that cannot be allowed to be there - traffic increases that we must indeed plan and build so as to eliminate.

Now is the time to rise to the call of an epochal emergency.

Do the math; don't do the project.

Sincerely,

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