

From: [Scott](#)
To: [Draft EIS Feedback; Columbia River Crossing;](#)
CC: mike.obrien@cascade.sierraclub.org; tim.gould@cascade.sierraclub.org; erica.maharg@oregon.sierraclub.org; scott.chapman@oregon.sierraclub.org;
Subject: Sierra Club DEIS Comments
Date: Tuesday, July 01, 2008 2:07:10 PM
Attachments: [SC DEIS Comment on CRC Final.doc](#)
[SC DEIS Comment on CRC Final.pdf](#)

Please find the attached DEIS comments on behalf of the Sierra Club.

Both files represent the identical set of comments but in two formats for your convenience. I am also sending copying both DraftEISfeedback@columbiarivercrossing.org and feedback@columbiarivercrossing.org on this transmittal and hope this does not cause any confusion.

You may direct any questions or feedback to me at the address below.

Sincerely,



Scott Chapman
Sierra Club Oregon Chapter
Land Use & Transportation Issue Coordinator
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**Comments on the Columbia River Crossing
Draft Environmental Impact Statement
Sierra Club
6/30/08**

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

Ms. Gundersen:

The Sierra Club submits this comment in response to the recently issued DEIS for the Columbia River Crossing (CRC) project. The Sierra Club has members who live, work and recreate in the I-5 corridor and the larger project area that the CRC will impact. To further our mission to enjoy, explore, and protect the planet, the Sierra Club reviewed this DEIS and the CRC process. We appreciate that the CRC Project Staff has emphasized and created opportunities for informal public involvement throughout this process, as we believe public input is essential to identify a solution to the present condition of the CRC corridor.

Based on its review, the Sierra Club requests the Columbia River Crossing issue a Supplemental EIS providing a full range of reasonable alternatives and fully disclosing the proposals' environmental and health impacts and associated benefits from mitigation measures. NEPA requires this SEIS include options that will not increase car capacity or induce sprawl, while promoting alternative transportation, bicycling and pedestrian access.

The DEIS purpose and need statement is insufficient under NEPA

The DEIS lists improving I-5 mobility for cars and freight, improving safety and structural integrity, and shortening travel times through addressing traffic demand as the CRC's purpose. The project needs identified are congestion, increasing traffic demand, impaired freight mobility, limited connectivity, transit options, bicycle/pedestrian access, and safety and structural problems. However, the purpose and need statement omitted timely and pertinent factors which resulted in the exclusion of reasonable alternatives from consideration.

The imperative to respond to climate change and reduce the greenhouse gas (GHG) emissions from our transportation system demands that project purposes include decreasing future traffic demand, rather than focusing on increased capacity to accommodate projected growth. The purpose and need statement does not incorporate the necessary environmental and health concerns. The public needs a bridge that will reduce air and water pollution associated with the current I-5 crossing, yet alternatives that would produce environmental and health benefits were not adequately considered. The statement should also address climate change mitigation in its list of needs; Washington, Oregon, Vancouver and Portland have all made commitments to reduce greenhouse gas emissions well below 1990 levels. Building a \$4 billion



bridge that takes the region further from its climate change goals, rather than helping accomplish them, clearly fails to meet this region's needs.

The DEIS range of alternatives is insufficient under NEPA

NEPA requires a project's DEIS to consider a full range of reasonable alternatives. However, the CRC DEIS fails to consider alternatives that address the asserted purpose and need without increasing car capacity, and does not justify a finding that those alternatives are not reasonable. The DEIS implies, but does not factually support, that a bridge proposal cannot address congestion without increasing highway capacity. Nowhere does the DEIS consider whether tolling, high capacity transit such as light rail, modern design, and bicycle/pedestrian access combined could adequately address congestion. A reasonable alternative including these components would achieve long-term traffic and environmental benefit, by avoiding the induced traffic and sprawl the current build alternatives will produce.

The DEIS fails to fully analyze and disclose environmental impacts

Repeatedly throughout the document, the DEIS foregoes real impact analysis until the FEIS. This undermines NEPA's requirement of full disclosure of environmental impacts. In its water quality, ecosystems and air quality analyses, the DEIS relies on the fact that the locally preferred alternative has not yet been chosen to delay analysis of each alternative's environmental impact. NEPA requires this analysis occur in the DEIS, so the public has the opportunity to comment on the predicted impacts of various alternatives. A locally preferred alternative does not preempt the obligation of the project agencies to analyze and select a preferred alternative consistent with NEPA and SEPA processes.

The replacement bridge alternatives will induce traffic, increasing greenhouse gas emissions and air pollution

The DEIS did not account for the induced traffic that will result from increased highway capacity. As a result, the DEIS' climate change and air quality analyses underestimate future pollution from the CRC project. Induced growth studies¹ indicate congestion benefits from increased highway capacity will be short-lived; long-term problems with induced sprawl in areas adjacent to the bridge influence area and more immediate induced traffic from decreased congestion, will quickly lead to overall increases in vehicle miles traveled and greenhouse gas emissions, as well as other automobile emissions. Pollutants of concern include carbon monoxide, oxides of nitrogen, particulates, and carcinogenic air toxics such as benzene.

Even under the DEIS' traffic projections, none of the build alternatives will achieve a benefit in greenhouse gas emissions compared with the no-build alternative. Certainly one of the alternatives in a full range of reasonable alternatives must at least be better than the do-nothing approach. For example, a transit enhanced option that extends high capacity transit over the river without increases in vehicle capacity would likely have different GHG emission outcomes.

¹ Todd Litman, September 2007, "Generated Traffic and Induced Travel: Implications for Transport Planning: Available at <http://www.vtpi.org/gentraf.pdf>

Yet, under a realistic traffic assessment, all of the proposed build alternatives will exacerbate climate change impacts.

Air quality may fare equally badly; though the DEIS offers no real analysis of pollutant impacts from the CRC project, increased traffic volume and vehicle miles traveled will produce more air emissions than an alternative that does not increase car capacity. The DEIS avoids this fact by assuming that compliance with National Ambient Air Quality Standards will adequately protect public health. What this fails to take into account, however, are the risks of pollutant “hotspots” in communities near the I-5 corridor. Ambient monitoring data cannot separate out neighborhood-level health risks, but they must be considered under NEPA’s assessment of all environmental impacts.

The DEIS further underestimates the results of induced traffic by not fully accounting for impacts on development. As recently cited in the *Oregonian*, CRC staff instructed traffic forecasters for the project to assume that different bridge alternatives would “have no influence on development patterns” and that the twelve lane replacement option “would not trigger any more growth” than maintaining current bridge capacity.²

Rationale for Requesting Supplemental EIS

In its evaluation of alternatives in the CRC project DEIS, Sierra Club supports alternative transportation modalities, including a light rail system and other forms of mass transit that link both sides of the river, and easy access by foot and bike. Sierra Club opposes a crossing that increases general purpose vehicle capacity. Such an increase will lead to increases in greenhouse gas emissions and prevent the cities, region, and states from achieving climate change impact reduction goals. We believe that a reasonable solution will emphasize good maintenance of infrastructure, safety, and the movement of people instead of vehicles. We favor the levying of variable price tolls on vehicles using the CRC corridors to lessen traffic demand and peak congestion. The Sierra Club is concerned that environmentally beneficial, reasonable alternatives were not advanced to the Draft Environmental Impact Statement stage, and that the CRC Project Staff did not make all supporting and opposing documents available to the public upon request, as required by NEPA.

² The *Oregonian*, “Columbia River bridge plans ignore effects of growth” (June 22, 2008), Available at <http://www.oregonlive.com/news/oregonian/index.ssf?/base/news/1214029515244280.xml&coll=7>

Conclusion

Because the CRC DEIS lacks the information necessary to determine the proposed alternatives' real environmental and health impacts, and because the alternatives proposed do not meet the region's needs or represent all reasonable options, the Sierra Club requests Columbia River Crossing create a Supplemental EIS. To comply with NEPA, and produce the best possible bridge proposal, this SEIS should provide a true range of alternatives that address relevant environmental objectives, along with sufficient information to determine their impacts. Thank you for your consideration.

Sincerely,

Erica Maharg
Sierra Club Oregon Chapter
Chapter Executive Committee Member
Columbia Group Chair

Michael O'Brien
Sierra Club Cascade Chapter
Chapter Chair