

County

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Sustainable Development Commission

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MULTNOMAH
COUNTY

June 2, 2008

Commissioner Jeff Cogen
Multnomah County, District 2
501 SE Hawthorne Blvd.
Portland, OR, 97214

RE: Columbia River Crossing

Dear Commissioner Cogen:



On behalf of the Sustainable Development Commission (SDC), we write to express several concerns about the proposed Columbia River Crossing (CRC) preferred alternative.

The SDC's charge to "develop and advocate for programs, policies, and actions by government, citizens, and businesses leading to sustainable communities in the Portland metropolitan area" compels us to draw your attention to potential conflicts of the CRC preferred alternative with local policies on sustainability and climate change. We also note that we do not have the expertise to speak to the safety or seismic issues associated with the existing bridge or the preferred alternative, and therefore those issues will not be addressed in this letter.

While we respect the long and difficult work of the CRC task force and staff, we are concerned that the data underpinning the CRC preferred alternative may be outdated or flawed. We base this opinion on the testimony of CRC staff to the SDC as well as on our observation of the changes in driver behavior and gas consumption over the past few months.

As you may know, bridge traffic over the Columbia River has decreased by at least 3 percent since February 2008.¹ Gas consumption on a per capita basis is down to 1966 levels.² Vehicle miles traveled (VMT) are down in Oregon, while transit use has increased.³ We believe these 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.

During their presentation, CRC staff told the SDC that the regional data they used to predict the need for more lanes on the bridge used gasoline prices well below what we are currently experiencing. Because of this, we respectfully recommend that an independent panel be appointed to review the analysis and data used for the CRC modeling. We would like to see updated modeling that uses current gas prices (and takes into consideration that many predict gas prices to rise on a sustained basis consistent with the Peak Oil Task Force findings). It is our hypothesis that if gas prices continue to rise, VMT will fall more quickly than the CRC staff findings show, and that this might allow the region to scale back the project, saving taxpayer dollars and reducing greenhouse gas emissions.

One other critical policy issue was not addressed by CRC staff, and that is the likelihood of carbon regulation with the advent of a new administration in Washington, D.C. We believe that the emergence of a formal carbon market—nationally and/or regionally—will drive further reductions in VMT and an array of

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other changes that may well affect the scale of this project. In fact, we strongly believe that every transportation project undertaken now and into the future must be viewed through the lens of our efforts to fight climate change and reduce greenhouse gas emissions 75 percent below 1990 levels by 2050, as required by Oregon law. This means a reduction well below current levels, and not simply a reduction below a forecasted business-as-usual future scenario.

As you know, the 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.

We want to communicate to you our strong support for the inclusion of the following into the CRC, no matter what the size and scope of the final project:

- Light rail transit (as opposed to bus rapid transit)
- Two 14-foot bike/pedestrian lanes (one line each way, rather than a single lane for bikes and pedestrians)
- Tolling and congestion pricing based upon time of day and frequency of use
- Sustainable stormwater management

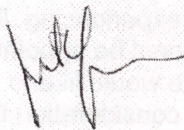
Finally, given the rapidly changing landscape of climate-related policies at the local, state and federal level, it would be helpful to explicitly consider the option of starting with a preliminary bridge toll prior to any construction. This user-pay approach would start generating revenues targeted for needed improvements, would yield additional insight for trip modeling and would allow more time for comprehensive transportation and land use plans to be developed to meet our climate change policies.

At a minimum, we respectfully request that an independent panel -- with expertise in, among other things, climate policy, greenhouse gas emissions modeling, and oil price/supply volatility -- review the data and analysis of the CRC project prior to the CRC Task Force vote scheduled for June 24, 2008.

Best regards,



Leslie Carlson
Co-chair



Justin Yuen
Co-chair

¹"Bridge Traffic Down," the *Vancouver Columbian*, May 7, 2008.

²"Braking News: Gas Consumption Goes Into Reverse," The Sightline Institute, April 2008

³"Portland Mass Transit Fills 'Er Up,'" the *Oregonian*, May 11, 2008

cc:

Sam Adams, City of Portland Commissioner
CRC Task Force

